

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

THE EXCELLENT THE EXCELLENT RAJ. )  
K. PATEL FROM ALL CAPACITIES, )  
 )  
Plaintiff, )  
 )  
v. ) No. 1:22-cv-01576-JPH-MG  
 )  
THE UNITED STATES, )  
 )  
Defendant. )

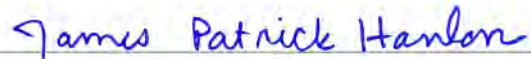
**ORDER**

This case was automatically opened upon transfer from the Eastern District of Pennsylvania. However, the case was opened in error because Mr. Patel is subject to a filing bar in this district. *See In re: Patel*, Case No. 1:22-mc-00024-TWP.

The clerk is **directed** to close this case and to docket the existing entries and future filings as "submissions" in 1:22-mc-00024-TWP.

**SO ORDERED.**

Date: 8/16/2022



James Patrick Hanlon  
United States District Judge  
Southern District of Indiana

Distribution:

THE EXCELLENT THE EXCELLENT RAJ. K. PATEL  
6850 EAST 21st STREET  
INDIANAPOLIS, IN 46219

UNITED STATES DISTRICT COURT

for the

E.D. Pa.

T.E. RAJ PATEL

Plaintiff/Petitioner

United States

Defendant/Respondent

Civil Action No.

APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS  
(Short Form)

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested.

In support of this application, I answer the following questions under penalty of perjury:

1. *If incarcerated.* I am being held at: \_\_\_\_\_.

If employed there, or have an account in the institution, I have attached to this document a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months for any institutional account in my name. I am also submitting a similar statement from any other institution where I was incarcerated during the last six months.

N/A 2. *If not incarcerated.* If I am employed, my employer's name and address are:

My gross pay or wages are: \$ \_\_\_\_\_, and my take-home pay or wages are: \$ \_\_\_\_\_ 0.00 per  
(specify pay period) \_\_\_\_\_.

3. *Other Income.* In the past 12 months, I have received income from the following sources (check all that apply):

- |  |   |  |
|--|---|--|
| (a) Business, profession, or other self-employment | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (b) Rent payments, interest, or dividends          | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (c) Pension, annuity, or life insurance payments   | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (d) Disability, or worker's compensation payments  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (e) Gifts, or inheritances                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| (f) Any other sources                              | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |

*If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.*

I recently received \$19,000 from my parents. I used it to pay off some of my credit card debt.

I still have over \$10,000 in outstanding credit card debt.

4. Amount of money that I have in cash or in a checking or savings account: \$ 6,500.00 .

5. Any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value that I own, including any item of value held in someone else's name *(describe the property and its approximate value)*:

N/A

6. Any housing, transportation, utilities, or loan payments, or other regular monthly expenses *(describe and provide the amount of the monthly expense)*:

I regularly have phone bill of \$100 and expenses to order to food. I pay the minimum of monthly expenses on my credit card.

I will have an expense for writ of certiorari for Patel v. United States, No. 22-1131 (Fed. Cir. 2022).

7. Names (or, if under 18, initials only) of all persons who are dependent on me for support, my relationship with each person, and how much I contribute to their support:

N/A

8. Any debts or financial obligations *(describe the amounts owed and to whom they are payable)*:

The amount of cash I have includes \$4,000 of a cash advance.

*Declaration:* I declare under penalty of perjury that the above information is true and understand that a false statement may result in a dismissal of my claims.

Date: **July 2, 2022**

  
Applicant's signature

Raj K. Patel  
Printed name

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

THE EXCELLENT THE EXCELLENT  
RAJ K. PATEL, from all capacities,

*Plaintiff*

v.

THE UNITED STATES

*Defendant*

No. \_\_\_\_\_

Dated: July 2, 2022

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**COMPLAINT**

I, T.E., T.E Raj K. Patel (*pro se*), respectfully move this District Court for the Eastern District of Pennsylvania to enforce a contract, for this battery/assault/torture/genocide/civil rights violation/conspiracy through a psycho-bio-tech stress weapon (body control too, as it made me drive a car) to end and to restore the privileges and/or immunities (privileges and/or immunities during and after office and for all acts before taking office, as privileges or immunities are “basic” protections, in other words for and against inherently violent things, such as for allowing use of force without statutory license and against a bio-tech stress-depression weapon) I hold under the United States Constitution,

including while I was the Representative to the Indiana State Bar Association of the Great State of Indiana and which I carry as 2013-2014 Student Government Association President of Emory University, Inc. (corporate sovereign 2013-present) in Atlanta, Georgia and 2009-2010 Student Body President of the Brownsburg Community School Corporation ("B.C.S.C.") (corporate sovereign 2009-present) in Brownsburg, Indiana. 18 U.S.C. §§ 241, 242, 245(b)(2)(A)-(B) & (F), *Burwell v. Hobby Lobby Stores, Inc.*, 134 S. Ct. 2751, 2270 (U.S. 2014), 28 U.S.C. § 1491(a)(1)-(2), and 18 U.S.C. §§ 2340 *et seq.* U.S. const., art. IV, § 2<sup>1</sup> & amend. XIV, § 1<sup>2</sup>; U.S. const., art. VI, § 1 and Grievances 21 & 23, Decl. of Independence (1776)<sup>3</sup>; U.S. const., art. IV, § 1; *United Building & Construction Trades Council v. Mayor and Council of Camden*, 465 U.S. 208 (1984); *see also* 18 U.S.C. § 2385 ("political subdivision"). Compare *United States v. Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. \_\_\_\_ (2021) (Roberts, C.J., The Constitutional hierarchy requires "the exercise of executive power [to remain] accountable to the people.") ("executive power" includes power to communicate, recognize, correct, constrain, incapacitate, touch, assault, kill, defend, etc.) with "political power" (includes all of the executive Powers and the power to make laws and adjudge). Central to my complaint, in this case number, is the enforcement of a few contracts or a multi-part contract with the United States. In addition, I plead for the Taking of my intellectual property, my word patterns, through means and methods of advance weaponry (left ear, *infra*), which is in control of the United States, such as the F.B.I. and/or C.I.A and/or The Oval Office. *See generally* 18 U.S.C. § 175. In addition to the necessary trespass

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1. "The citizens of each state shall be entitled to all privileges and immunities of citizens in the several states."
  2. "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States..." (includes state- and federal- created corporations, *see* Grievance 21, Decl. of Independence (1776) and U.S. const., art. VI, § 1).
  3. Disengaging the bio-tech weapon is therefore a priority for T.H. (T.E.) President of the United States.

and auto-stalking and because of the number of encounters I have had with and am having with this stress weapon and the other parties involved, local, state, and federal support was important or the lack thereof. *See generally Asahi Metal Indus. Co. Ltd. v. Superior Court*, 480 U.S. 102 (1987) (stream of commerce; supply-chain theory) and 18 U.S.C. §§ 1951 & 1961. Counter-weapons also do not work, which are available through either over-the-counter or prescription, which would stop attack on the human evolution of my future direct descendants, as the weapon is closely connected with the brain or cerebellum. U.S. const., amend. II. Beyond these aforementioned statutory and constitutional matters, my First Amendment right to Free Exercise of Religion (i.e. gains for forward human evolution, including physical exercising; my religion tells me to workout; brain's religious-side was prevented from being used, *see* 18 U.S.C. § 247(a)(2) and *infra* (Framer's comment on the mind))<sup>4</sup>, Freedom of Expression, Academic Freedom, prohibition of Establishment of Religion (Plaintiff, who is Constitutionally styled "The Excellent" in the United States for his political executive offices, including from Emory University (school of one of President Obama's half-brothers, Mark Obama))<sup>5</sup>, White, Indian, etc. terrorists, Fourth Amendment unlawful search and seizure, 13<sup>th</sup> Amendment, 5<sup>th</sup> and/or 14<sup>th</sup> Amendment Due Process, the Guarantee Clause, federally-prohibited "pains" were violated, breach of contract, defamation, theft of intellectual property (my verbatim word patterns), and civil-Racketeer Influenced and Corrupt Organizations ("R.I.C.O.") Act (with possible multiple predicate crimes) violations, tortious interference in a business

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4. "The 'exercise of religion' involves 'not only belief and profession but the performance of (or abstention from) physical acts' that are 'engaged in for religious reasons.'" *Hobby Lobby*, 134 S. Ct. at 2270 quoting *Employment Division v. Smith*, 494 U.S. 872, 877 (1990). "It means, too, the right to express those beliefs and to establish one's religious (or nonreligious) self-definition in the political, civic, and economic life of our larger community." *Hobby Lobby*, 134 S. Ct. at 2285 (Kennedy, J., concurring).

5. *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, No. 20-1199 (U.S. 202\_) (especially applicable to the 2009-2010 and 2014-2015 and other admissions cohorts) (describing terroristic efforts to re-categorize Asian-Americans, East-, South- and Central-, into "all Asians are smart" or "all Asians are not smart" based on its admissions application "likeability" factor).

transaction, honest services duties, and functional removal the constitutional office of a candidate for the United States Presidency. 18 U.S.C. §§ 1931-34, 1951, & 1961 *et seq.* (minimum two predicate acts include extortion of intellectual property, which is also Taking, interference of law school applications, interference with college applications, interference in academic coursework in middle school, high school, Emory University, and Notre Dame Law School, making me obese (“serious bodily injury”), interfering with my political subdivision incumbencies from 2009-2010, 2013-2014, and 2017, use of biological weapon, and use of neuro-chemical weapon) and 42 U.S.C. § 1983. 18 U.S.C. §§ 1961–1968 & 1343–1346; *United States v. Nixon*, 418 U.S. 683 (1974); and *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971). Relief is proper under 28 U.S.C. §§ 1491(a)(1)-(2) and the respective civil relief statutes for R.I.C.O., 18 U.S.C. §§ 1961 *et seq.*, honest services fraud, 18 U.S.C. §§ 1931-34, prohibition on intimidating in commerce, 18 U.S.C. § 1951, interstate and foreign racketeering, 18 U.S.C. § 1952, civil rights, 42 U.S.C. §§ 1981-1985 and 18 U.S.C. §§ 241 *et seq.*, and genocide, 18 U.S.C. §§ 1091(b)-(c). 28 U.S.C. § 1652. Nonetheless, the University of Notre Dame du Lac, in South Bend, Indiana, denied me my re-admissions permanently as of July-August 2021, even though medical professionals approved me for re-admissions since January 2018, and its acts violate the privileges of being a student who seeking a juris doctor degree. *See e.g.*, 18 U.S.C. §§ 241 *et seq.* (privilege of being a student; incumbency of being Representative from the Notre Dame Law School Student Bar Association to the Indiana State Bar Association) (all university admissions is regulated by the United States Department of Defense, as I know through partisan information) (local police is regulated by the United States Department of Homeland Security) (lawyers are very likely to continue politics and are essential in cultivating government policy). *See* 42 U.S.C. § 1983.

## OTHER ON-GOING LITIGATION & RELATED FEDERAL CASES

### FEDERAL CASES

1. *Patel v. United States*, No. 2022-1131 (Fed. Cir. May 19/June 2, 2022), *pending cert.*, No. \_\_\_\_ (U.S. 202\_).
2. *T.E., T.E. Raj K. Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021).
3. *Patel v. Biden et al.*, No. 2022-5057 (D.C. Cir. June 8, 2022).
4. *Patel v. Biden et al.*, No. 1:22-cv-00394-UNA (D.D.C. Mar. 9, 2022).
5. *Patel v. Chief of Staff, The Executive Offices of the President of the United States*, No. 2022-1962 (Fed. Cir. 202\_) (mot. for stay) (filed June 29, 2022).
6. *Patel v. The Executive Offices of the President*, No. 7419 (CBCA June 24, 2022).
7. *Patel v. Biden et al.*, No. 1:22-cv-01658-UNA (D.D.C. 202\_) (pet. for writ of mandamus § 1361).
8. *Patel v. Biden et al.*, No. \_\_\_\_\_ (N.D. Ga. 202\_) (pet for. writ of mandamus § 1361).
9. *Patel v. United States*, No. 1:22-cv-00734-LAS (C.F.C. 202\_) (pet. for writ of mandamus § 1651).

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### Federal Courts Without Subject-Matter Jurisdiction for Big Tucker Act Claims

10. *Patel v. Trump Corp.*, No. 20-1513, 141 S. Ct. 2761 (June 14, 2021), *reh'g denied*, 141 S.Ct. 2887 (U.S. Aug. 2, 2021).
11. *Doe v. Trump Corp.*, No. 20-1706, 2020 WL 10054085 (2d Cir. Oct. 9, 2020).
12. *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-9936-LGS (S.D.N.Y. May 26, 2020), Dkt. 272.
13. *Patel v. F.B.I. et al.*, No. 1:18-cv-3441-RLY-DML (S.D.I.N. Nov. 13, 2018).
14. *Patel v. F.B.I. et al.*, No. 1:18-cv-3442-WTL-DML (S.D.I.N. Nov. 13, 2018).
15. *Patel v. F.B.I. et al.*, No. 1:18-cv-3443-TWP-MJD (S.D.I.N. Nov. 13, 2018).
16. *Patel v. Trump et al.*, No. 1:20-cv-454-SEB-DML (S.D.I.N. Feb. 19, 2020).
17. *Patel v. Trump et al.*, No. 1:20-cv-758-RLY-MJD (S.D.I.N. Apr. 14, 2020).
18. *Trump v. Vance, Jr. et al.*, No. 1:19-cv-8694-VM (S.D.N.Y. July 9, 2020), Dkt. 45.
19. *Patel v. Patel et al.*, No. 20-2713 (7th Cir. Jan. 21, 2021).
20. *Patel v. Patel et al.*, No. 1:20-cv-1772-TWP-MPB (S.D.I.N. Sept. 1, 2020).



21. *Carroll v. Trump*, No. 1:20-cv-7311-LAK (S.D.N.Y. Oct. 28, 2020), Dkt. 36.
22. *Patel v. Martinez et al.*, No. 3:21-cv-241 RLM-JPK (N.D.I.N. Apr. 8, 2021).
23. *Patel v. The President of the United States Joe Biden et al.*, No. 2:21-cv-01345-APG-EJY (D. Nev. Aug. 9, 2021).
24. *Patel v. United States*, No. 1:21-cv-22729-BB (S.D. Fla. Aug. 12, 2021).
25. *Patel v. United States et al.*, No. 1:21-cv-2219-JMS-TAB (S.D.I.N. Aug. 20, 2021).
26. *Patel v. United States et al.*, No. 1:21-cv-2263-UNA (D.D.C. Sept. 8, 2021).
27. *Patel v. United States et al.*, No. 2:21-cv-4160-NKL (W.D. Mo. Sept. 13, 2021).
28. *Patel v. United States et al.*, No. 2:21-cv-16029-SDW-CLW (D.N.J. Sept. 20, 2021).
29. *Patel v. The United States et al.*, No. 1:21-cv-6553-LTS (S.D.N.Y. Sept. 20, 2021).
30. *Patel v. The United States et al.*, No. 1:21-cv-2250-RLY-MG (S.D.I.N. Sept. 21, 2021).
31. *Patel v. United States et al.*, No. 1:21-cv-11429-LTS (D. Mass. Sept. 24, 2021).
32. *Patel v. Biden et al.*, No. 21-5155 (D.C. Cir. Sept. 27, 2021).
33. *In Re Raj K. Patel*, No. 21-5153 (D.C. Cir. Aug. 6, 2021).
34. *Patel v. Biden et al.*, No. 1:21-cv-1076-TSC (D.D.C. July 2, 2021).
35. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3335-MLB (N.D. Ga. Oct. 5, 2021).
36. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3376-MLB (N.D. Ga. Oct. 5, 2021).
37. *Patel v. United States et al.*, No. 3:21-cv-628-RLM-APR (N.D.I.N. Oct. 7, 2021).
38. *Patel v. Biden et al.*, No. 22-cv-465-JMS-MG (S.D.I.N. Mar. 24, 2022).
39. *In Re Raj Patel*, No. 22-mc-00024-TWP (S.D.I.N. Mar. 28, 2022) (2 yr. prejudice from filing before the S.D.I.N.). *Contra*. ECF 31, *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022).

### QUESTIONS

1. Does this District Court for the Eastern District of Pennsylvania read ECF 31, *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022) as finding a contract based on an identical complaint enclosed and thus overturning *Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021)?

2. Regardless of answer to question #1, does the breach of the contract-at-hand with a prayer for damages, which is pleaded successfully, in *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022), ECF 31, contain an express provision within the contract-at-hand to handle a breach of the contract-at-hand which would then allow this United States District Court for the Eastern District of Pennsylvania to have concurrent subject-matter jurisdiction with the Court of Federal Claims, including for claims over \$10,000 against the Defendant-United States, under the Tucker Act, 28 U.S.C. 1491 (a), and/or The Contract Dispute Act, 41 U.S.C. §§ 7101 *et seq.*?<sup>6</sup>

### SUBJECT-MATTER JURISDICTION

[1] The United States, Sovereign, hegemon, protector, and keeper of our Excellencies' weaponries and other shared technologies, through Its Government, is the Defendant. *See* U.S. const., art. VI, § 1. *Cf.* U.S. const., amends. IX (with basic and basis protections, per art. IV, § 1 and amend. XIV, § 1) & XI; Randy E. Barnett, "The People or The State?: *Chisholm v. Georgia* and Popular Sovereignty." 93 Va. L. Rev. 1729-1758 (2007); and *Chisholm v. Georgia*, 2 U.S. (2 Dall.) 419 (1793) (if U.S. const., art. VI, § 1, then U.S. const.,

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6. *Todd v. United States*, 386 F.3d 1091, 1094 (Fed. Cir. 2004). *Oliva v. United States*, 961 F.3d 1359, 1365 (Fed. Cir. June 15, 2020). *Boaz Hous. Auth. v. United States*, 994 F.3d 1359, 1364 (Fed. Cir. Apr. 16, 2021) citing *San Juan City Coll. v. United States*, 391 F.3d 1357, 1361 (Fed. Cir. 2004); accord *Holmes v. United States*, 657 F.3d 1303, 1314 (Fed. Cir. 2011). *United States v. Winstar Corp.*, 518 U.S. 839 (1996), "damages are always the default remedy for breach of contract." *Id.* at 885 (plurality opinion) (citing, e.g., Restatement (Second) of Contracts § 346, cmt. a (1981)). *Sanders v. United States*, 252 F.3d 1329, 1334 (Fed. Cir. 2001). 28 U.S.C. § 1346 (Court of Appeals for the Federal Circuit can think that the case does not sound in tort and is subject to concurrent jurisdiction in the Court of Federal Claims and the Civilian Board of Contracts Appeal; the E.D. Pa. can think that it does sound in tort for abridging its dues to Protect me via the Privileges & Immunities Clause, U.S. const. art. IV, § 2; sovereign immunity waived). 28 U.S.C. 1491(a). FTCA, 28 U.S.C. §§ 1346(b), 1402(b), 2401(b), and 2671-2680. *Boaz Hous. Auth. v. United States*, 994 F.3d 1359, 1365-66 (Fed. Cir. Apr. 16, 2021) (*Higbie v. United States*, 778 F.3d 990, 993 (Fed. Cir. 2015) is consistent with *Holmes v. United States*, 657 F.3d 1303, 1314 (Fed. Cir. 2011) because the non-monetary remedy provided in *Higbie's* alternative dispute resolution agreement supplanted the general rule that most contracts contain implied rather than express provisions specifying the basis for an award of damages in case of breach.). Compare *Higbie v. United States*, 778 F.3d 990, 995 (Fed. Cir. 2015) (mediation agreement had a provision in it which was purely not-money mandating) with *Cunningham v. United States*, 748 F.3d 1172 (Fed. Cir. 2014) (mediation agreement had money provision).

amend. IX states that the People, who are the natural-born citizens of the United States, are sovereign). *Bolling v. Sharpe*, 347 U.S. 497 (1954) cited in *United States v. Windsor*, 570 U.S. 744, 804 (2013) (discussing equal protection under the Fifth Amendment). 28 U.S.C. § 2674. *United States v. Testan*, 424 U.S. 392, 398 (1976) (The Tucker Act...“waives” the United States “sovereign immunity.”) and *Fisher v. United States*, 402 F.3d 1167, 1172 (Fed. Cir. 2005).

The Constitution is violated, especially the 5<sup>th</sup> Amendment Due Process (with Lenity), the 14<sup>th</sup> Amendment Due Process (with Lenity), the Privileges and Immunities Clause (*In re Quarles and Butler*, 158 U.S. 532 (1895)) (including but not limited to “the right to inform the United States authorities of violation of its laws”), and the Privileges or Immunities Clause. See e.g., *United Building*, 465 U.S. at 208 and *Bivens*, 403 U.S. at 388.

Acts of Congress material to the case include, but are not limited to, 18 U.S.C. §§ 241 *et seq.* (deprivation of privileges and/or immunities), 18 U.S.C. §§ 1961-1968 (R.I.C.O.), 42 U.S.C. §§ 1981-1983 (deprivation of civil rights, 5<sup>th</sup> Amendment; theft of intellectual property), and 18 U.S.C. §§ 1931-1934 (honest services) (theft of intellectual property; protection).

A Founding Document, the Declaration of Independence (1776) (“certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness”), are also material, as it protects intellectual property. U.S. const., art. VI, §§ 1-2 (“Preceding Clause”, prior treaty engagement; Supremacy Clause) (Paris Peace Engagement – Congressional Proclamation of Jan. 14, 1784 (See Yale Law School’s Avalon Project, [https://avalon.law.yale.edu/18th\\_century/parispr2.asp](https://avalon.law.yale.edu/18th_century/parispr2.asp)) (every citizen is required to uphold the Treaty of Paris “sincerely, strictly, and completely,” as it conditionally transferred sovereignty to the United States and Sister States while keeping King George III

and his lawful successors as The Absolute)<sup>7</sup>. *Contra*. 28 U.S.C. § 1502 (limits of this statute as applied to “prior engagements,” Article VI, Section 1 of the United States Constitution (1789), is unconstitutional) (Congress must allow all lower tribunals to interpret prior engagements, including Treaties by the United States in Congress and the Articles of Confederation, and/or Congress must allow all lower tribunals to interpret Treaty of Paris (1783) because the Treaty or the Treaty’s Congressional ratification (Jan. 14, 1784) creates the United States as a new nation). U.S. const., art. VI, § 1 & art. III, § 1. *See also infra*, note 12. *Contra*. Treaties approved after the Ratification of the United States Constitution (1789).

Damages owed to Plaintiff by Defendant-United States exceeds \$10,000. *Simanonok v. Simanonok*, 918 F.2d 947, 950-51 (Fed. Cir. 1990). 28 U.S.C. § 1491(a)(1). “47. Court of Federal Claims Litigation,” *Justice Manual*, Civil Resource Manual, The United States Department of Justice (2018), <https://www.justice.gov/jm/civil-resource-manual-47-court-federal-claims-litigation> (last visited Aug. 16, 2021).

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7. “Magistracy” includes student government presidents’ jurisdictions and has vestiges of political Power, i.e. analogous to the powers of an absolute monarch, some of which are also vested in the Commander-in-Chief of the United States Military, Armed Forces, and Space Force; “executive Power” vested in the President and “judicial Power” vested in the Supreme Court and lower tribunals, including but not limited to from the Roman Kingdom/Empire/Republic and the *shah*’s and *raja*’s of India, including of the Boston Tea Party. *See* Grievance 20, Decl. of Independence (1776) (System of English Laws includes the vestiges of the politics Great Britain replaced), Treaty of Paris (1783) and U.S. const., art. VI, § 1, art. II, § 1, cl. 1, & art. III, § 1, cl. 1. *See also* President John Adams, “Death of George Washington,” December 19, 1799, <https://millercenter.org/the-presidency/presidential-speeches/december-19-1799-death-george-washington> (Accessed Aug. 19, 2021) (His example is now complete, and it will teach wisdom and virtue to magistrates, citizens, and men, not only in the present age, but in future generations as long as our history shall be read.). *Cf.* Magistracy of contemporary “magistrate judge.” *See also* President James Monroe, “Seventh Annual Message (Monroe Doctrine),” December 2, 1823, <https://millercenter.org/the-presidency/presidential-speeches/december-2-1823-seventh-annual-message-monroe-doctrine> (Accessed Aug. 19, 2021):

The Military Academy has attained a degree of perfection in its discipline and instruction equal, as is believed, to any institution of its kind in any country...It is unnecessary to treat here of the vast improvement made in the system itself by the adoption of this Constitution and of its happy effect in elevating the character and in protecting the rights of the nation as well as individuals. To what, then, do we owe these blessings? It is known to all that we derive them from the excellence of our institutions. Ought we not, then, to adopt every measure which may be necessary to perpetuate them?”

### WELL-PLEADED COMPLAINT STANDARDS

“[A] *pro se* complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007). *Pro se* plaintiffs are “not expected to frame issues with the precision of a common law pleading.” *Roche v. U.S. Postal Serv.*, 828 F.2d 1555, 1558 (Fed. Cir. 1987). *Pro se* plaintiffs must establish this Court’s jurisdiction over their claims by a preponderance of the evidence. *See Alston-Bullock v. United States*, 122 Fed. Cl. 38, 40 (2015); *see also Spengler v. United States*, 688 F. App’x 917, 920 (Fed. Cir. 2017). “The fact that [the plaintiff] acted *pro se* in the drafting of his complaint may explain its ambiguities.” *Minehan v. United States*, 75 Fed. Cl. 249, 253 (2007); *accord Henke v. United States*, 60 F.3d 795, 799 (Fed. Cir. 1995).

Under the Fed. R. Civ. P. 8(a)(2), a pleading must contain a “short and plain statement of the claim showing that the pleader is entitled to relief.” As the Court held in *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), the pleading standard Rule 8 announces does not require “detailed factual allegations,” but it...must contain sufficient factual matter, accepted as true, “enough to state a claim to relief that is plausible on its face.” *Id.*, at 570. A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged. *Id.*, at 556. The plausibility standard is not akin to a “probability requirement,” but it asks for more than a sheer possibility that a defendant has acted unlawfully. *Id.* and *see also Iqbal*, 556 U.S. at 662. In other words, the court must assess whether “a claim has been stated adequately” and whether “it may be supported by [a] showing [of] any sets of facts consistent with the allegations in the complaint.” *Twombly*, 550 U.S. at 563. The plaintiff’s factual allegations “must be enough to raise a right to relief above the speculative level.” *Id.* at 555. In reviewing plaintiff’s allegations in support of jurisdiction, Federal

Claims Court must presume all undisputed facts are true and construe all reasonable inferences in plaintiff's favor. *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974), *abrogated on other grounds by Harlow v. Fitzgerald*, 457 U.S. 800, 814-15 (1982); *Reynolds v. Army & Air Force Exch. Serv.*, 846 F.2d 746, 747 (Fed. Cir. 1988) (citations omitted). "[Complaints] must be construed so as to do justice." Fed. R. Civ. P. 7(b) & 8(e).

For the parts in a complaint related to R.I.C.O., *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 248-250 (1989) states, as precedent to *Twombly* (2007) and *Iqbal* (2009), that "the facts alleged in the complaint [by a petitioner or prosecutor, must be read] in the light most favorable to petitioners...[and courts may only dismiss] the complaint if "it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations." *H.J. Inc.*, 492 U.S. at 248-250 citing *Hishon v. King & Spalding*, 467 U.S. 69, 73 (1984). "Congress drafted RICO broadly enough to encompass a wide range of criminal activity, taking many different forms and likely to attract a broad array of perpetrators operating in many different ways." *H.J. Inc.*, 492 U.S. at 248. Moreover,

As [Supreme] Court stressed in *Sedima*, in rejecting a pinched construction of RICO's provision for a private civil action, adopted by a lower court because it perceived that RICO's use against non-organized-crime defendants was an "abuse" of the Act, "Congress wanted to reach both *legitimate*' and *'illegitimate*' enterprises." 473 U.S. at 499. *Legitimate businesses "enjoy neither an inherent incapacity for criminal activity nor immunity from its consequences"; and, as a result, § 1964(c)'s use "against respected businesses allegedly engaged in a pattern of specifically identified criminal conduct is hardly a sufficient reason for assuming that the provision is being misconstrued."*

*Sedima, S.P.R.L. v. Imrex Co., Inc.*, 473 U.S. 479 (1985). In the concurrence of *H.J. Inc.*, 492 U.S. at 256, Justice Scalia wrote:

However unhelpful its guidance may be, however, I think the Court is correct in saying that nothing in the statute supports the proposition that predicate acts constituting part of a single scheme (or single episode) can never support a cause of action under RICO. Since the Court of Appeals here rested its decision on the contrary proposition, I concur in the judgment of the Court reversing the decision below.



See generally *Dred Scott v. Sandford*, 60 U.S. (19 How.) 393 (1856), *United States v. Nixon*, 418 U.S. 683 (1974) (no person or no project/experiment is above the law, the Federalist Project/Experiment), *Clinton v. Jones*, 520 U.S. 681 (1997) (individual's acts before becoming president are not subject to Presidential immunity), and *Nixon v. Fitzgerald*, 457 U.S. 731 (1982) (immunity limited to official acts). See also Fed. R. Civ. P. 21. Cf. parties to a case. "No man is above the law and no man is below it: nor do we ask any man's permission when we ask him to obey it," said United States President Theodore Roosevelt. See also Paris Peace Treaty – Congressional Proclamation of Jan. 14, 1784 (every citizen should uphold the Treaty of Paris "sincerely, strictly, and completely"). See also U.S. const., amend. XI (states not immune). See also *Downs v. Bidwell*, 182 U.S. 244, 382 (1901) ("No higher duty rests upon this Court than to exert its full authority to prevent all violation of the principles of the Constitution."). *U.S. v. Lee*, 106 U.S. 196, 220 (1882) (Miller, J.):

No man in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law and are bound to obey it. It is the only supreme power in our system of government, and every man who by accepting office participates in its functions is only the more strongly bound to submit to that supremacy and to observe the limitations which it imposes upon the exercise of the authority which it gives...

Courts of justice are established not only to decide upon the controverted rights of the citizens as against each other, but also upon rights in controversy between them and the government...[the] Secretary of War...[and] officer had no more authority to make than the humblest private citizen.

### **STATEMENT OF FACTS**

In September 1992, I was born, in New Jersey, and my family and I lived there until the summer of 2000. In the spring of 1998, my parents, my younger brother, and I visit the United Kingdom and India. In 1999 or before moving to Indiana in 2000, my

family and I visited the World Trade Center. In the summer of 2000, my family and I moved to Indiana. On September 11, 2001, when I was in the fourth grade, the terrorist attack on the World Trade Center happened. The term “War on Islam” is popularized, and the United States began the on-going Global War on Terror (“GWOT”).

- I. Somewhere in 2005 or 2006, a loud ringing sound played in both of my ears, and I lost some awareness of what was going on. During this happening, though, I noticed I was in my room on my bed, and I saw a South Asian woman who was dressed in pants and a t-shirt sitting on my bedroom desk chair. I knew that she was a terrorist. I, later, realized that I had seen her earlier on the family room television, while she was dressed up as a Hindu goddess.<sup>8</sup> This was not regular TV programming over satellite, but a TV-hack. I soon realized that she had laced me a psycho-bio-tech in my skull. In the alternative, she was trying to give me an antidote to counter a previous infection of a psycho-bio-tech weapon. I know when the stress weapon is engaged because it makes sound, or I get a shockwave or lash from the communication. When the President of the United States or another honorable or excellent is about to say my word patterns, I get sound bite message or notification in my ear or my attention is suddenly directed to turn on the television or social media and there is no shockwave or lash, but are rather healing. By the President of the United States repeating my word patterns, I know they have the same data as the terrorist; hence, the United States is/was observing.
- II. During the 7<sup>th</sup> or 8<sup>th</sup> grade, during course registration for the next year, a classmate randomly came up to me in the hallways on my middle school and repeated a

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8. Religion must be “‘accor[d] with history and faithfully reflec[t] the understanding of the Founding Fathers.’” *Kennedy v. Bremerton School Dist.*, No. 21-418 \* 23 (U.S. June 27, 2022) (internal citations omitted) (Gorsuch, J., majority) (internal citations omitted).



verbatim word pattern from a previous conversation I said at home, which immediately stressed me out. I do not know if a person has free will in saying the words or if they are made to say it, as the weapon can control bodily movements. See paragraph LVII.

- III. In the summer of 2006, before the freshman year of high school, I visited India for six (6) weeks.
- IV. From the moment described in paragraph II and onward, at sporadic moments, teachers, fellow students, professors, or television news anchors would repeat my word patterns. These verbatim word patterns trigger the weapon to induce severe stress. The magnitude of the stress increases in 2013, increases again in 2014, and increases again in 2017.
- V. Before entering high school and while T.H., T.H., T.H. (T.E.) George W. Bush was President of the United States<sup>9</sup>, I started making pornography videos of myself and posted them on social media for about a year and half. I used the videos to combat the stressors, to ensure that I would not be forced to leave school.<sup>10</sup> I also used my videos to display my fitness transformation.
- VI. In the ninth grade, I asked one of my classmates why our English classroom teacher said the word pattern at the beginning of the class. The classmate said, “I

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9. The President of the United States is styled “T.H.” in domestic affairs and “T.E.” in foreign affairs. As the Federalist and anti-Federalist put it, the President is no King. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. \_\_\_\_ (2021) (Roberts, C.J., The Constitutional hierarchy requires “the exercise of executive power [to remain] accountable to the people.”) (The Excellent’s are closer to the people in the United States). Without the Treaty of Paris (1783), the President of the United States would be styled “Her Majesty’s Honorable President of the United States” (in domestic affairs) and “Her Majesty’s Excellent President of the United States” (in foreign affairs), and I would always carry the styles “Her Majesty’s Excellent Student Body President of B.C.S.C.” and “Her Majesty’s Excellent Student Body President of Emory University, Inc.” U.S. const., art. VI, § 1. See also *infra*, note 12.

10. A similar psycho-bio stress technology is used to change involuntarily someone’s sexual orientation. See Christy Mallory, Taylor N.T. Brown, Kerith J. Conron, *Conversion Therapy and LGBT Youth Update*, UCLA School of Law Williams Institute, <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Conversion-Therapy-Update-Jun-2019.pdf> (Accessed Aug. 18, 2021).

don't know." The next day the classmates told me that he was "activated" and that once I am done losing weight, I am going to gain it back. In addition, after college, I will gain a bunch of fat mass and but not enough weight to cause excessive skin. He also said that there was no stopping it. The classmate added that I would receive a minimum of "\$1 per American" for my "adversity" for having to live under the stress weapon.

- A. I said, "that is about \$300M." (Now, over \$328M).
  - B. Then, the classmate said, "yeah."
  - C. I told him about the person in paragraph I, and I added that, even though she is Indian, she could be working for another race- or color-based terrorist organization to stop me from going to one of the best universities.
  - D. Then, he said that we will have this conversation "again another time."
  - E. One other classmate witnessed the conversation.
  - F. I did not offer the classmate any money, unlike in paragraph IX because I was surprised by the conversation, and I did not know that I could.
  - G. I reserved the thought that I had already contacted the President of the United States (who I assumed would use the Federal Bureau of Investigations ("F.B.I.")) and the Central Intelligence Agency ("C.I.A.") about the tech-surveillance/ eavesdropping to induce the stress.
- VII. During my freshman year, I also become a sole proprietorship, upon declaration, with a conglomerate structure.
- VIII. During my sophomore year of high school, I asked one of my classmates, who would later become the class president for both our junior year and senior year, to observe the triggering of a stress weapon by our business classroom teacher. I also told him about the conversation in paragraph VI, and I disclosed the name of the

classmate in paragraph VI. The classmate said he would speak to the classmate in paragraph VI, and he would be able to “help.”

IX. Then, the classmate from paragraph VIII, in our business-elective classroom, asked me a series of questions, but he stated that he was “activated” to turn off my stress.

A. At this moment, I said the stress, depression, or another induced mental disability was to prevent me from becoming the President of the United States, reflecting on what was going on Pakistan (of the British *Raj*) to the now-late, now-assassinated Benazir Bhutto, and going to the Ivy League undergraduate institutions by deflating my grades and test scores and my even sabotaging my legal career, all of which would prevent me from being rich or having \$100M or more before becoming President of the United States, which was interestingly already the sum of damages by the stress weapon accrued by this time, as I told him.<sup>11</sup>

B. The classmate said the classmate from paragraph VI said I was going to have more than \$100M.

1. I said, “I didn’t know” he told you about that part.
2. As this classmate and I are closer friends than the classmate mentioned in paragraph VI, he said, “where was I?!”
3. I said, “we did not have class together” that year.
4. Then, he said, “okay, let me help you know...it means I am going to give you money now.”

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11. Stream of Commerce/Supply-Chain Theory can be understood: (A) middle school to high school, high school to college, college to law school, law school to law firm, law firm to appointment, election, and/or \$100M+, and (B) Grades and/or SAT and/or ACT to college, college to grades and LSAT, and grades and LSAT to law school, law school to law school grades, law school grades to appointment, election, and/or income \$750M+. *Asahi*, 480 U.S. at 102 and *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286 (1980). The amount of money goes up after my performance at Emory University and the University of Notre Dame Law School, including the current-deflated grades.

5. A witness classmate who is also the person who sat next to me at my assigned sit and a study buddy said, “more than \$100M!”
6. Then, another witness who is an upper classman (a senior) and who sits next to this classmate at their assigned sits exciting said, “more than Gordan Hayward,” who was our high school school-mate (a senior) and was yet to become a National Basketball Association (N.B.A.) basketball player. (Gordan Hayward is currently worth over \$220M.).
7. Then, the classmate said, while pointing his pencil at me, “you will have at least \$100M and more money than Gordan Hayward.”
8. I said, “okay,” as I already know that, “but I still want at least \$1 per American, and I want to be the richest from B-C-S-C.”
9. He said, “okay, you will be.” The classmate witnesses nodded.

C. Then, I returned to the inquiry about observing our business school teacher using the stress weapon and how the classmate from paragraph VI was also a witness of our English teacher using the stress weapon. I also told him that I am a victim of terrorism, as mentioned in paragraph I, and that my parents could have hired the terrorist to make me join their hotel-motel business after college, but I told him that I doubt that they would do that.<sup>12</sup>

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12. Because of the organized domestic terroristic powers, including from the White nation, the Black nation, the East Indian nation, East Asian nation, etc., within our country, combating Untied States Power. U.S. const. VI, § 1 (“prior engagement”); Grievance 3, Decl. of Independence (1776); Definitive Treaty of Paris (1783); and Alien & Sedition Acts (1798).

1. I also told him, in the alternative, the female dressed as a Hindu Goddess could be trying to cure of me of any mental disability induced by a White, Black, Arabic, Hispanic, etc. terrorist. *See supra*, note 5.
2. Yet, I added that I am guessing that only another Indian-American community member, especially my doppelganger, had to benefit from this battery, per college, law school, and employment standards.
3. I also said that if the State of Indiana or the United States was doing this then they would wait until the last minute because a rational power would want to see how able I actually am.
4. Then, the classmate swiftly said, “we are not going to speak about that right now.”
5. Then, the classmate said the stress weapon will be turned off for the Advance Placement United States Government exam, which I received a 5 out of 5 in May 2010.<sup>13</sup>

D. I also told him that the stress or depression was illegal and unconstitutional because it was battery and violated my freedoms. If anything, people would mistake me having the mental disability of obsessive-compulsive disorder (O.C.D.), as I was focused on my academic and career path and fitness.

E. I asked him to promise me that I would receive “money,” including for my “lost opportunities” and “what I have to go through,” for this constitutional

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13. The stress weapon was engaged throughout the times I took the PSAT, SAT, SAT subject tests, most AP tests, ACT, LSAT, and GMAT. When I took the GMAT test, a computer-based test, I remember the stress weapon changing thresholds in between the exam.

violation in exchange for the United States “learn[ing]” how this technology works (as I knew the United States was observing and would continue to observe) and for “improving” lives (i.e. by letting someone have what I would have had but for this stress situation and giving me my damages and applying what the United States learns from my stress situation in aiding other stress-weapon victims).

1. The classmate said, “yes,” so the stress/depression/“mental disab[ility]” technology would stay on but the stress weapon would be used only a few more times before it severally starts and that I would know it when it severally starts.
2. I also informed him that I want to do this to “uphold the United States Constitution,” irrespective of the fact that I was then a member, not-officer of the high school’s student council.
3. I asked him if I need to write anything done, although I know I would remember.
4. Then, he said, “no, we’ll have the data.”

F. I asked him if he would like 1/3 of the money recovered from the United States, and he said “yes” and that he knew he could “trust” me.

1. I told him that we each get a 1/3 for our contribution for this conversation and that I get an additional 1/3 because I will have to live this situation. Then, the to-be-class president classmate said, “I need a moment. Honestly, \$100M is a lot of money for me.”
2. I quickly said, “no, it is not, but it is good to have. Bill Gates has a lot of money.” I added, “the President can print the money,” while Congress has the power of the purse, and “give it to me.”

3. He said, “that is a good point.”

G. He also said that a car will come in front of my house and play loud music which I already know once my mental disability starts.

H. He also said that I would have the money “by the time I was 30 years old” and that I “can go to court before then.” I told him that I would sue, but I really did not want because it could delay me going to college or law school and because I really like learning and fashion I am aiming for the best, elite universities.

I. He told me that I did not need law school to practice law. I said, I know because I would be an elected official if I became student government president in high school and anyone can also represent themselves.

J. I also told him that the Treaty of Paris (1783)<sup>14</sup> is what American constitutional law comes down to, while referring to Section 1 of Article VI of the United States Constitution, and said its principles are being broken. I left open the possibility of getting representation from the White House directly in restoring the Constitutional protections.

K. I also told him that I would major in political science over business, most likely, because political science was the science more on point for law.

L. The classmate and I also agreed that I can “three times the money” in court and agreed again that I can “go to court before the age of 30 to collect the money” from the United States.

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14. The Definitive Treaty of Peace (Sept. 30, 1783) (See Yale Law School’s Avalon Project, [https://avalon.law.yale.edu/18th\\_century/paris.asp](https://avalon.law.yale.edu/18th_century/paris.asp)) (conditional transfer of sovereignty; “promote and secure to both perpetual peace and harmony”; King George III and his lawful successors remain The Absolute). Paris Peace Treaty – Congressional Proclamation of Jan. 14, 1784 (See Yale Law School’s Avalon Project, [https://avalon.law.yale.edu/18th\\_century/parispr2.asp](https://avalon.law.yale.edu/18th_century/parispr2.asp)) (every citizen should uphold the Treaty of Paris “sincerely, strictly, and completely”). See generally U.S. const., art. VI, § 1.

M. I asked him if I would get fat still, and he said that he did not have time to overwrite that, as he was inactivated by this time.

N. I said it is okay because if I become Student Body President, I would be immune to these technologies.

O. I asked him if President Bush knows by now, and he said, "I think so."

P. As three of our other classmates witnessed this dialogue:

1. The to-be-class president classmate asked, "what about them," as he pointed to the classmates with his pen or pencil.
2. I said, we will give them money too, setting no amount or percentage.
3. And, we requested that these three classmates-witnesses not to repeat anything about this conversation yet.
4. They nodded, and other classmates started walking into class.

Q. Right when class was going to start, I returned to my assigned seat. Once class started, quarter-size white lights in the shape of a circular rings or disks pierced through the glass window and tried to enter my classmate's person, but the teacher used his paper to smack the white rings/disks off route.

R. I saw the same white lights, which were dime-size, in the seventh grade in my social studies class; the rest of the time, I only saw quarter-size white rings/disks.

X. In 2008, the classmate mentioned in paragraph IX and I attended a Barack Obama for America rally in Indianapolis.

XI. On Inauguration Day 2009, T.H., T.H. Barack Obama is sworn into office of the United States Presidency to become T.H., T.H., T.H. (T.E.) Obama.



- XII. In April or May 2009, I was elected as the Student Body President of B.C.S.C. and the President of the Brownsburg High School student government.
- XIII. Additionally, during the 2009-2010 school year, when I was the Student Body President, I made a cartoon animation which inadvertently featured the female dressed as a Hindu goddess who I also thought was a terrorist from paragraph I. The animation was taken off of my school computer and U.S.B. thumb drive, which I still have, by same authority known by the United States and controlling this stress weapon.
- A. At the time of making the animation, I did not realize who she was.
- B. But, as I describe in paragraph LI, while reflecting at the Emergency Detention Center of the St. Vincent Stress Center, I realized that it was the female dressed as a Hindu goddess who I also thought was a terrorist, mentioned in paragraph I, who had made it into the detailed animation. I remembered seeing her before high school, when she appeared on the family room television and then in-person in my bedroom.
- C. I used Microsoft Powerpoint to make the animation slides.
- XIV. In 2010, the stress weapon was engaged again. I contacted the Obama White House through [www.whitehouse.gov](http://www.whitehouse.gov). On the contact page, I mentioned that I was the student government president and that I was under unlawful surveillance/eavesdropping, which was causing me stress and possibly interfering with my college applications. The next day, a faculty member of the Brownsburg High School came to my classroom to turn off the stress.
- XV. In August 2010, I enrolled at the Oxford College of Emory University, Inc. in Oxford, Georgia.

- XVI. In September 2010, I was elected as a senator with the most votes in the divisional student government for Oxford College of Emory University.
- XVII. In April 2011, I was disqualified for the candidacy of divisional presidency of Oxford College of Emory University for a flyer violation. The Oxford Senate refused to overturn my disqualification.
- XVIII. In May 2011, I started tracking my weight on an iPhone application.
- XIX. In September 2011, the Oxford Elections Board disqualified 18 freshman senators on the same precedent I was disqualified on.
- XX. In December 2011, I visited India again for a couple of weeks.
- XXI. In February 2012, my Oxford College classmate, now a lawyer, and I had the aforementioned precedent in paragraphs XVII and XIX overturned by the Constitutional Council of the Emory University Student Government Association.
- XXII. While waiting for a college shuttle, someone came up to me and injected me with a translucent liquid chemical. I did not notice anything as the stress weapon was not engaged.
- XXIII. In August 2012, I started school at Emory College of Emory University in Atlanta, Georgia.
- XXIV. In Spring of 2013, the stress weapon was engaged, and a professor used it on me while standing in front of the classroom. In April 2013, I won the election for the Emory University student government presidency, after an elections debate sponsored by Emory University's student newspaper.
- XXV. In April or May 2013, Ajay Nair, Ph.D., then-Senior Vice President and Dean of Campus of Life at Emory University, Inc. and supervisor of my student govern-

ment advisor, at our first meeting after being sworn in as Emory University student government president, used the stress weapon on me by saying random word pattern, [OMITTED], to me.

A. I responded, "Sorry? I don't know what you mean."

B. Then, Nair said, "it must be somebody else."

C. We continued seamlessly in the conversation.

D. At the end of this meeting, Nair asked me if he could have the contact information of my student government advisor from high school, and I gave him the contract information.

XXVI. During my senior year, when the Central Intelligence Agency (C.I.A.) was visiting Emory University for the university's career fair. I was called in for an interview, and the C.I.A. Officer said [OMITTED] to trigger the stress weapon while conducting my interview.

XXVII. In April 2014, while I was still student government president of Emory University, Inc., at our regular monthly meeting in Nair's office, Nair excitingly began a conversation with me by saying a word pattern, [OMITTED].

A. I felt the region above my right ear have two parallel wires pull back.

B. Then, my left ear started wiggling like I was receiving a message.

C. Nair said, "I am the F.B.I.," and I remembered Nair telling me at an earlier meeting that he is regular contact with F.B.I. Nonetheless, I assumed Nair might be working with the terrorist, mentioned in paragraph I, too, because he had used the stress weapon on me and was an Asian-American expert. But, as the conversation proceeded, I knew that Nair was working for the F.B.I. and updating me on what the stress weapon was going to do next. *See also* paragraph II.

D. I said, "oh."

E. Then, Nair said that I would gain a lot of weight and that I would start to become depressed and that I would have no choice to avoid it.

1. I said, as long as I get "\$1 million dollars per pound gained."
2. He said, "okay."
3. Then, I asked him, "how much weight?"
4. Then, Nair said, "it will be a surprise."
5. Then, I asked, "over 100 pounds?"
6. Then, he said, "easily."
7. Then, I said, "as long as nothing irreversible happens, then I'm okay with it."
8. I told Nair that the terrorists are taking this approach because I am "electable," odds they want to reduce or eliminate especially for the Presidency of the United States, and I will otherwise still be "well-off." I also said that the terrorist is doing this because I am "more fuckable" and "more likeable" than those at Harvard University. *See supra*, note 5.
9. I weighed 150 pounds and around 10% body fat. I said thank you and that my friend also promised me money, as I mentioned in paragraph IX, but neither I did not tell Nair about the conversation in paragraphs IX or VI nor did Nair bring up that conversation.

F. Nair called judges "mentally disabled, not smart."

1. I responded by saying that "anyone can be mentally disabled" and that it means that the person deviates, either side, from the standard, such as Facebook Founder Mark Zuckerberg.

2. Plus, I said that my parents and ancestors are legal immigrants; therefore, I am not likely to be mentally disabled (regressive), either genetically or socially. To clarify, I said, I am of “Indian descent” (India is the fattest country in the world).

G. Nair and I spoke about going to law school and that after taking a gap year, I would apply to the University of Notre Dame, which is located in my home state of Indiana, and other *U.S. News* Top Law Schools.

1. During this part of the conversation Nair also said, “you can do better than” Notre Dame.
2. I said I know and that I can easily get into Columbia University, but I will most likely go to a better Ivy League school, based on my at-home Law School Admissions Test administration, although I went to Notre Dame because of this stress weapon.
3. I also mentioned that the chairperson of one of my academic departments and thesis advisor suggested that I apply to graduate school for a Ph.D., but I was planning on attending law school for a J.D. first, even though I may apply for a Ph.D. or M.B.A. or another masters degree while in law school.

H. I told him that I have the highest level of testosterone and jokingly said it also at the “criminal level,” and I said it is because I workout and am happy. I said that it is also the leadership hormone in men, interestingly.

I. Then, while looking down and with a frown on his face, Nair said, people will start saying bits and “pieces of this conversation wherever you go. We can see everything you see and hear everything you can hear.” I did not tell him that this is how the stress weapon works and that he had used it on me

already, and we made no reference to our meeting described in paragraph XXV.

J. On my way out of his office, I asked him if I had anything to worry about, and he said “no.”

K. I did not tell Nair that I had contacted President Barack Obama via [www.whitehouse.gov](http://www.whitehouse.gov) earlier that morning.

XXVIII. In May 2014, I graduated from Emory University with a Bachelor of Arts in Political Science and with Honors in Religion and with a cumulative grade point average of 3.718 out of 4.0.

A. I also authored an honors thesis in the Department of Religion, called “Weight Loss as a Religion,” and proposed a scientific method of racism in weight-loss politics.

B. The cumulative grade point average includes the grade deflation the stress weapon caused from almost every semester at Emory University.

XXIX. Around graduation and afterwards from Emory University, I noticed that President Obama used some of my word patterns from Emory University student government campaign debate, as described in paragraph XXIV, and House leadership used my quotes during press conference from my conversation with Nair.

XXX. Some of closest friends from Emory University, after we graduated together, seemed to be invited to be stressors, and they used verbatim word patterns from my conversation with Nair, as discussed in paragraph XXVII. I explained to them what was going on. And, for the first time, the stress weapon seemed to be configured to auto, as the right side of my brain above my right ear felt like there is swirling, hurricane-pattern sound.

- XXXI. In the summer of 2014, I again contacted President Obama, addressing him as Commander-in-Chief and President, via [www.whitehouse.gov](http://www.whitehouse.gov) and told him that this situation is going to affect my political career, my upcoming Law School Admissions Test, and my law school applications and admissions decisions, as he may remember from my previous contacts, and I updated him about conversation in paragraph XXVII, including the fact that I thought Nair was playing both sides.
- XXXII. A young South Asian woman, who was in her 20's and dressed in traditional South Asian grab, came to my house, and escorted me to my bedroom. She touched my right eye and told me go to sleep. Kartik father let her into the house. I think she was either a counter-witch or a counter-terrorist.
- XXXIII. In September 2014, around the time of my birthday, the classmate mentioned in paragraphs VIII and IX and I went out to eat at the local Buffalo Wild Wings. It was clear that the stress weapon was still engaged as he used it on me, repeating word patterns from my conversation with Nair in paragraph XXVII. I asked him why he said, and he told me "don't think about it too much."
- XXXIV. In October 2014, during my dad's dad's funeral, Dhaval Patel, my dad's youngest sister's son, came into my room, when I was getting ready and told me to hurry up, and yelled in my face with his fist up and said, "I will treat you the way you treat others."
- A. The pretext of the conversation was alluding to my student government political campaigns, duties, rights, and privileges. I also told Dhaval that our parents' dad would complaint that his wife knew black magic witches who were causing pain in his knee and stress, and I said that Kartik has me under surveillance.

B. According to Dhaval Patel, my dad asked Dhaval to have me come downstairs as the function was about to start.

C. Kartik had the funeral taped.

XXXV. In October 2014, the terrorist mentioned in paragraph I appears again on the family room television again and send out white lights and rings from the television and entered my grandmother's eyes.

A. The terrorist, mentioned in paragraph I, also said that she was here because someone had died and that she is going to kill someone in the next "seven years."

B. Then, she asked, "is that Raj?" Then, she proceeds to answer her own question and says, "no, that can't be Raj. That's someone else."

C. Then, she played a parody or spoof scene depicting the *Ramayana*, the Hindu epic. As I was watching the scene, I realized that I had watched it before, as mentioned in paragraph I and that I had made an animation of her, as mentioned in paragraph XIII. I watched silently, except I asked my grandmother, "why do you watch this weird stuff?"

D. Once the scene was over, she said, "Raj, have fun in law school!" and that a ring can last "up to seven years."

E. The white ring or disk made my grandmother say "go to sleep" in Gujarati, although it was the afternoon. I went upstairs and went to sleep.

XXXVI. In or around October 2014, on invitation from Neal K. Patel, my younger brother, Charmi Patel, my dad's younger sister's only daughter, and Vidhi Patel (now



Vidhi Patel Sharma)<sup>15</sup>, my dad's second oldest sister's youngest daughter, attended Neal's legacy pinning ceremony at the Oxford College of Emory University. While en route to Oxford College, Vidhi makes me get out of her car on Highway 278 NW in front of Taco Bell in Covington, Georgia. As I got out of the car, Vidhi requested that I get back in the car and that she will drop me off at our hotel first; Charmi yelled, "No, let him. He's needs to learn a lesson." Vidhi, Charmi, and Neal drove off to Oxford College, taking my luggage with them in the trunk; I walked to the Holiday Inn hotel which was about a mile away. Charmi, Vidhi, and Neal were extremely upset and jealous that I was Student Body President of Emory University, Inc.; Neal<sup>16</sup>, Charmi<sup>17</sup>, and Vidhi were all arguing with me when I was driving Vidhi's car.

XXXVII. Sometime between January to April 2015, when I visited a United States Military recruiting for the Marines, I had met the qualifications, and I did not have the stress weapon used on me.

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15. Sometime around the year 1994, the United States Department of State positioned Vidhi Patel and her family in my residence, my castle in South Plainfield, New Jersey. Vidhi recently married Neal Sharma; Vidhi is now named Vidhi Patel Sharma.

16. In the car, I brought up how Kartik did not buy me a brand-new car in high school, and I had to use my grandfather's Toyota Camry to get around, whereas Kartik bought Neal a brand-new Acura in high school. I did not have a brand-new car, Audi Q5, until junior year of college. I also spoke about how the stress weapon hindered me from going to a higher-, elite-ranking school but that I still made the most of Emory University. I also brought up almost all of the reasons why I did not get along with my mom and dad. Neal was also a part of the Brownsburg High School student government, as an academic advisor; the academic advisor office did not exist during my incumbency. Family psychology also says that the older sibling is substantially more likely to perform better in school and life; terrorism, this conspiracy, is the only reason why there is a break in family psychology, as taught in College Board's Advance Placement ("A.P.") Psychology course, which I took during my junior year of high school; such is the case between Charmi Patel and her older brother, Dhaval Patel. I also brought up my altercation with Dhaval Patel at our grandfather's funeral, either a few weeks or a month prior. Charmi did not attend the funeral because she had to stay in Colonia, NJ for their now-late dog.

17. Charmi was also upset because Nina Patel, my aunt and Charmi's mother, divorced her father, Ashok Patel, after Ashok kicked Nina in their bed, at the time; Charmi was upset that Nina told me this. Charmi has been trying to get her parents, who divorced in or around 2000, back together.

A. Yet, once the general walked in, on my way out, it seemed like he was trying to engage the stress weapon based on his facial expression.

B. I thought that the Military would add to my carry, as my resume and political attainments clearly show that I wish to be Commander-in-Chief of the United States Military, Armed Forces, and Space Force.

XXXVIII. In or around May 2015, I received the Indiana Supreme Court Indiana Conference of Legal Education Opportunity scholarship to attend the University of Notre Dame Law School.

XXXIX. In August 2015, I enrolled at the University of Notre Dame Law School. Professor M.M. engaged the stress weapon on the first class of the first day of law school. Then, Professor Root engages the stress weapon on the same day by using verbatim word patterns from the conversation I had with Nair, as described in paragraph XXVII. During the second semester, Professor A.B. and the late Professor J.N. engaged the stress weapon. Not much happens during the first year of law school, except it feels like the depression or stress weapon is still left on auto. My classmates would be able to serve as a witness.

XL. In 2016, candidate Donald J. Trump mentioned a few scenarios which made me suspicious of my privacy, including the use of my body language and word patterns. Once President Trump was sworn in, he spoke about inter-governmental *coup de tat* and domestic warfare, repeatedly.

XLI. In February or March 2016, Professor R. returned her Fall 2015 contracts course exam because of her pregnancy, which is either a two (2) or three (3) month delay from the University of Notre Dame Law School's grading policy, per its Hoynes Code.

- XLII. In the summer of 2016, I did not put in transfer applications to top law schools, including but not limited to Harvard Law School, despite my cumulative grade point average (G.P.A.) being in the safely in the 25<sup>th</sup> percentile or above, because of the stress weapon.
- XLIII. In or around August or September 2016, two of my second-year roommates used the stress weapon on multiple occasions, including the first time I met them. No other roommates to that date have used the stress weapon on me.
- XLIV. During the second year of law school, Professor O. engaged the stress weapon regularly by imitating word patterns from the conversation I had with Nair in paragraph XXVII.
- XLV. During the third year of law school, Professor R., Professor F., Professor Ma., and Professor P. regularly engaged the stress weapon, with Professor R. being the most aggressive at the beginning on the classroom, almost everyday. The other professor would use the word patterns within sentences, so it hard to spot them. This time the word patterns would come from Keenan Hall, the all-male dormitory in which I was an assistant rector, or conversation I would have over the phone, either my voice call or text message, instead from paragraph XXVII.
- XLVI. From August or September 2017 to the time I take a voluntary separation of leave in good standing from the University of Notre Dame Law School, I contacted the White House, Department of Education, Department of Justice, and the F.B.I. about the happenings in the life, including the use of the psycho-bio-tech weapon which induces stress and the surveillance/eavesdropping; I also made about two visits to the F.B.I. office in South Bend, Indiana. During each visit with the F.B.I.-South Bend, it seemed like the agent was aware of the happenings.

- XLVII. In September 2017, I was elected as the Notre Dame Law School Student Bar Association Representative to the Indiana State Bar Association.
- XLVIII. In or around September 2017, I was asked to resign from Keenan Hall, but I got to keep my scholarship and grant benefits. I called Nair around this time, and I heard his phone receive a notification or text message. Then, Dr. Nair said a word pattern from one my law school classrooms. I then learned that my replacement was a fellow law student. The professors continue to use the stress weapon.
- XLIX. I e-mailed now-Her Honor Justice Amy Barrett on her University of Notre Dame e-mail from my University of Notre Dame student e-mail, but I did not receive a response.
- L. On or around November 11, 2017, I took a voluntary separation of leave in good standing from the University of Notre Dame Law School, both the law school and the university administration approved my leave in good standing. I also resigned from my Notre Dame Law School Student Bar Association representative position. I was also not subject to a refund as my tuition was covered by scholarships and grants.
- LI. On or around December 7, 2017, I was put on emergency detention at the St. Vincent Stress Center in Indianapolis, Indiana for three days and charged with pointing a gun at another person by the Brownsburg Police Department in Brownsburg, Indiana.
  - A. Charmi Patel, my dad's sister's daughter, and Nina Patel, my dad's sister and Charmi's mother, and Manisha Patel, my mother and Kartik's wife, were sleeping in master bedroom.
  - B. Nina communicates with Kartik about pointing a gun or that I am threatening to kill myself.

- C. Kartik, my dad, calls the police from Indianapolis, where he was spending the night at his motel due to the occupancy in our house.
  - D. Prior to being put on emergency detention several verbatim word patterns were said over CNN and Netflix.
  - E. While in the St. Vincent Stress Center, the United States Military doctor for President Trump announces that President Trump's mental health is just fine, as I saw on CNN.
  - F. I called Professor R. from the St. Vincent Stress Center to see if she could terminate these happenings.
- LII. On or around December 20 and 21, 2017, I told Peter Horvath about my intentions to reapply to the University of Notre Dame Law School. Peter sent me the link to reapply. I filled out the application honestly, including the ongoing conviction about pointing a gun at another person. Peter writes to me, "At this point we want to let you know that you will not be readmitted to the University while this charge is pending. Further, you will not be considered for readmission unless the pending criminal charge is favorably resolved." He added, "Certainly you are welcome to keep us informed as the matter works toward resolution."
- LIII. Around Christmas 2018, I moved to my apartment on North Capitol Avenue in downtown Indianapolis, Indiana. In January 2018, I receive a supportive letter of re-admission to the University of Notre Dame Law School from a female medical professional who was either a physician assistant or nurse practitioner. I submitted this letter to the University of Notre Dame.
- LIV. On April 30, 2018, the felony charge was dismissed. The police dispose of my gun.

LV. Around this time, I saw the white lights/rings/disks come out of my fourth-level apartment window and fly into my nostril; these set of white rings/disks also announced that “Notre Dame game you rings.” Another set of white lights/rings/disks flew out of my computer (MacBook Pro 15 inches) when I was Googling a military website. I also started hearing a drilling sound in my head and a high-pitch hummingbird sound, which faintly lasts to the date of the filing of this complaint. Then, two white lights/rings/disks flew out of my iPhone, from its charger plug-in area, while I was on Instagram. After these three sets of white rings/disks, I saw a white ring/disk come out of a computer screen while I was watching a famous soap opera on its network’s website.

- A. The rings began inducing hunger into me and got me off my strict diet.
- B. Immediately, I noticed that I had to curtail my exercising from 3.5 hours to 4 hours, the amount of time I can easily allocate to even during a full course load, to about 45 minutes.
- C. I also heard cracking sounds and a compact disc shuffling sound inside my head.
- D. My eyes started flicker in the same marks as mentioned in paragraph XXXII.
- E. I felt a thin, hair-like wire go along my arm and leg bones, inside my body.
- F. Thus far, I have gained 187 pounds. I was 150 pounds and around 10% body fat when Nair told me what would happen. The unwanted weight gain has caused a change in the clothes (i.e. “religious grab”) that I can wear and the brands.

LVI. I kept President Trump abreast about the happenings in this case at [www.whitehouse.gov](http://www.whitehouse.gov). I also re-informed President Trump, in his capacities as President of the United States and Commander-in-Chief, about my conversations

detailing the contract with the United States with my classmates and Nair as mentioned in paragraphs VI, IX, XXXIII, and XXVII, the happenings in paragraph I and LV, and about my previous contacts with the White House; I also mentioned, for the first time, to T.H. (T.E.) Trump, that I made and starred in a few hand full of solo pornography videos while in middle school and high school, over the course of two years, as described in paragraph V. I asked T.H. (T.E.) Trump, if he would communicate back and show that he agrees to the contractual terms, and I told him that current total for damages are “from “750M to \$3 billion, to be multiplied by three.”

A. The next day or a few days later, President Trump sent me a signal through the television that he did agree to the contract too, after my attention was diverted to the television. President Trump displayed an “E,” “yes,” and “you” in sign language through the television, after he used my word patterns from my conversation with Nair as mentioned in paragraph XXVII, at a public rally. Then, I used [www.whitehouse.gov](http://www.whitehouse.gov) to let President Trump know that I received his communication.

1. The “E” refers to “The Excellent,” which is my style and how I signed off my message to President and Commander-in-Chief Trump.
2. “Yes” to denote agreeing.
3. “You,” by pointing his finger, at me through the television.

B. President Trump used my word patterns once more at a campaign rally, and President Trump showed me his left ear. I followed up on [www.whitehouse.gov](http://www.whitehouse.gov).

- LVII. I was made to drive my car to the old Indianapolis airport, via the private roads, which I never take.
- LVIII. I visited the F.B.I. Indianapolis-HQ two times.
- A. During both visits, I insisted that my situation was top-top secret, top-secret, confidential, or sensitive.
  - B. The agent triggered the stress weapon the first time. The female agent also offered to call the University of Notre Dame administration, which I agreed to.
  - C. The second time I met two officers who both denied knowing anything about my situation.
- LIX. In 2018 and onward, I no longer met the requirements for the United States Military, because of the stress weapon, and I was denied recruitment.
- LX. In summer of 2018, at the LifeTime Fitness by the F.B.I. Indianapolis-HQ, I saw the person mentioned in paragraph I; she approached the trainers there and “activated them.” She changed the sound of the psycho-bio-tech weapon, which played a hummingbird sound, to a loud-deep sound, although the effects only lasted for a week. Further, around this time, Policy Advisor Ivanka Trump’s Instagram story was used to unlock the psycho-bio-tech weapon. My phone was locked for multiple days. Around this time, I spent one evening and afternoon at my Brownsburg, Indiana residence (*see* paragraph LI), and I saw these white lights/disks come in from my bedroom window and enter my dog’s nose, as he was sleeping on his bed on the ground.
- LXI. Starting from this time, a loud car comes by my Indianapolis downtown apartment to play a song from my pornography videos described in paragraph V, usually around 2:30am. The loud car does not come when I move into my mom and dad’s



home in Brownsburg. The car returns when I move into my housing at our family motel in Indianapolis, in March 2021.

- LXII. Then, I wrote to T.H. (T.E.) Trump to let him know that I am sorry about additional charges which I feel compelled to bring, in order to avoid claim or issue preclusion.
- LXIII. On August 23, 2018, the Superior Court of Hendricks County, Indiana granted me a protective order against Kartik Patel, my father and a naturalized United States citizen from India. *Patel, Raj v. Patel, Kartik*, No. 32D05-1808-PO-000372 (Ind. Super. Ct., Hendricks Cnty. August 2018).<sup>18</sup>
- LXIV. In November 2018, I filed three (3) lawsuits, all of which were dismissed, in the Southern District Court of Indiana:
  - A. *Patel v. F.B.I. et al.*, No. 1:18-cv-03441-RLY-DML (S.D.I.N. Nov. 13, 2018),
  - B. *Patel v. F.B.I. et al.*, No. 1:18-cv-03442-WTL-DML (S.D.I.N. Nov. 13, 2018),
  - and
  - C. *Patel v. F.B.I. et al.*, No. 1:18-cv-03443-TWP-MJD (S.D.I.N. Nov. 13, 2018).
- LXV. In or around January 17, 2019, the felony charge was expunged.
- LXVI. In April 2019, I told T.H. (T.E.) Trump via [www.whitehouse.gov](http://www.whitehouse.gov) that one of my Emory University classmates has become a billionaire and my damages exceed his net worth.
- LXVII. On May 30, 2019, I flew into Seattle, Washington. At my hotel in Seattle, Washington, on 10<sup>th</sup> floor or so, a word pattern was thrown into the window, which I did not understand.

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18. I sought the protective order for contacting me even though I asked him to stop. The protective order was issued, and, while seeking this protection order against Kartik Patel, I was able to avoid the stress weapon because I walked into the courthouse. Throughout the time the protection order was intact, contrary to what The Honorable judge ordered (standard form order), the stress weapon remained engaged. If Kartik's and other persons' presumptions of innocence are not overcome, then the United States is also responsible, as state court decisions are not binding on the United States. I, later, withdrew the protective order because I needed cash.

- LXVIII. Beginning of June 2019, I visit San Diego for a three-day trip. Once I landed at the San Diego trip, the Uber Drive said a verbatim word pattern which activated my stress. And, while watching E! Network, the stress weapon was activated.
- LXIX. In mid-June 2019, I flew into Miami, Florida to take a three-day cruise. At the Miami Airport, my phone was giving me problems. The cruise was stress-weapon free.
- LXX. I applied for re-admission for Fall 2019, and I completed the application material for re-admissions. I was denied re-admissions upon the recommendation of the University of Notre Dame University Counseling Center, although the ultimate authority for re-admissions into the law school lies with the Notre Dame Law School itself.
- LXXI. In February 2020, I filed a lawsuit, which was dismissed, in the Southern District Court of Indiana: *Patel v. Trump et al.*, No. 1:20-cv-00454-SEB-DML (S.D.IN. Feb. 19, 2020).
- LXXII. In March 2020, I filed a lawsuit, which was dismissed, in the Southern District Court of Indiana: *Patel v. Trump et al.*, No. 1:20-cv-00758-RLY-MJD (S.D.IN. Apr. 14, 2020).
- LXXIII. For Spring 2020, I again re-applied for readmissions. I was again denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center.
- LXXIV. By this time, I had informed President Trump that I will permanently have excess skin from weight gain, if I do not stop gaining as soon as possible, and that I will need skin removal surgery which causes irreversible scarring. I was about 280 pounds.

LXXV. Around the beginning of the COVAID-19 pandemic, I started regularly residing back at my residence in Brownsburg, Indiana. *See* paragraph LI. Then, in April 20, 2020, my younger brother, Neal K. Patel, who is a student at the Georgetown Law Center, and I stayed at The Trump International Hotel in Washington, D.C. with the hopes of getting a meeting with President Trump. As I was speaking with my brother about asymptomatic patients or individuals with COVAID-19, the cable news anchor puts her finger on her ear bud and then asks the pundit, “Doctor, what about asymptomatic patients?” President Trump posted an Instagram photo displaying [OMITTED].

LXXVI. For Fall 2020, I again re-applied for re-admissions. I was again denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center.

A. Kevin O’Rear stated:

I also want to note that, if you choose to apply for readmission to Notre Dame Law School in the future, your application will be reviewed on the basis of all of the facts of which we are aware at the time. Readmission to the Law School is not guaranteed, although whether you have filed litigation against the University will not, in and of itself, prevent you from being admitted.

We are, however, required to review each applicant's character and fitness to be admitted to the bar. We have received many messages from you in the past few years that are disturbing and which raise serious questions about your ability to pass a character and fitness review. I flag this so that you may (1) guide your behavior going forward and (2) be aware that the Law School may decide

in the future that, based upon your conduct, including disturbing notes to University faculty and officials since your withdrawal, you are not eligible for readmission.

B. I responded by stating, “Why is this even a material consideration for re-admissions? Relationships with law school professors is not a part of application process. You're reprimanding me without trial by the Hoynes Code, which probably does not apply to the time I am not a law student. Further, it is retaliation for using my First Amendment rights.” And, “per the law, I do not foresee any legal questions raised to pass a character and fitness test. *See* I.C. 35-38-9-10(b)(4)-(6), (d) & (e). In fact, I feel discriminated by your answer on my character and fitness.” (Italics in original).

LXXVII. On May 21, 2020, in the Southern District Court for New York, I filed a motion to intervene in a pending case against T.H. (T.E.) Trump, in his personal capacity: *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-09936-LGS (S.D.N.Y. May 26, 2020), Dkt. 272 (subject matter found but denied intervention), *appeal denied* No. 20-1706 (2d Cir. October 9, 2020) *certiorari denied*, *Patel v. Trump Corp.*, No. 20-1513 (U.S. June 14, 2021), *rehearing denied* (Aug. 2, 2021).

LXXVIII. In July 2020, Policy Advisor Donald Trump Jr. posted an Instagram post [OMITTED], and I move out of my downtown Indianapolis apartment.

LXXIX. For Spring 2021, I again re-applied for re-admissions. I was again denied re-admissions upon the recommendation of the University of Notre Dame University Counseling Center.

LXXX. I contacted the Biden-Harris Transition Team to update them about my situation.

LXXXI. On Inauguration Day 2021, T.H., T.H. (T.E.) Biden is sworn in as the President of the United States to become T.H., T.H. (T.E.), T.H. (T.E.) Biden, and, as a part of

his inaugural address, T.H., T.H. (T.E.), T.H. (T.E.) Biden stated that the People of the United States are in an “un-civil war,” eluding to the general climate inside the United States borders. T.H., T.H. (T.E.), T.H. (T.E.) Biden mentioned a word pattern from paragraph IX. I contacted the White House to inform them about the contract, mentioned in paragraphs VI, IX, XXXIII, XXVII and LVI, which I also assumed T.H., T.H. (T.E.), T.H. (T.E.) Biden already knew from his term in office as Vice President of the United States; I addressed T.H., T.H. (T.E.), T.H. (T.E.) Biden as President and Commander-in-Chief too, and I asked him for one more communication to ensure the contract, mentioned in paragraphs VI, IX, XXXIII, XXVII and LVI, for “\$750M to \$3.76B to be multiplied by three as treble monetary damages.”

- LXXXII. President Biden copies body language and cough patterns during a press conference which I was led to watch.
- LXXXIII. I applied to porn websites to be a model, and they told me to lose weight. I weighed 337lbs by this time.
- LXXXIV. In July 2021, the loud car gave me my first asthma attack and caused my trachea to completely shut for a second. I woke up coughing. I developed bronchitis for about two months. I have been living at my family’s motel in Indianapolis since March 2021, as we are selling our Brownsburg, Indiana residence since my parents are building a bigger house in Greater Indianapolis. *See* paragraph LI.
- LXXXV. On August 2, 2021, the Supreme Court of the United States gives a decision on my petition for re-hearing dated June 15, 2021. *Patel v. Trump Corp.*, No. 20-1513 (U.S. Jun. 14, 2021), *rehearing denied* (Aug. 2, 2021).
- LXXXVI. On August 14, 2021, at approximately 2:13PM EST, while looking at President Biden’s photo on my Instagram Feed, I heard, on the left side of my brain above my left ear, through the C.D.M.A. (Code Division Multiple Access)- or G.S.M.

(Global System for Mobiles)- enabled, skull-built-in seamless psycho-bio-technology, “The deal is, if you can get us into court, you get the money.” The Instagram was from Fox News’s account. Yet, at other times, White House verified accounts are also used to play messages.

- LXXXVII. For Fall 2021, I again re-applied for re-admissions. This time, I was permanently denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center. Contrary to prior communications with Jake Baska and Dean Kevin O’Rear, who are both agents of the University of Notre Dame Law School, I was told that I may only apply for as a first-year student to the University of Notre Dame Law School, which would require me to re-take the Law School Admissions Test, and that re-admissions application would not be considered for Spring 2022.
- LXXXVIII. On September 21, 2021, Dhaval Patel texted me at 9:00pm EST and asked me to stop sending him e-mails, including court service. At 9:06pm EST, Dhaval said, “[you’re] not excellent anything.”
- LXXXIX. Some of the accessories in this situation were not fluent in the English language but could repeat my verbatim word patterns. In fact, throughout parts of America, many areas I visited are not-English-speaking. Grievance 20, Decl. of Independence (1776) (not using the System of English Laws is a form of tyranny, i.e., not speaking the English Language) & U.S. const., art. VI, § 1.
- XC. In addition, two (2) people have asked me to represent them as legal counsel, and I have not been able to represent them because I have not completed law school, as a result of the psycho-bio-tech stress weapon.
- XCI. Most sadly, this has affected my Thinking and intellectual Freedoms; religiously speaking, my Hindu *rajyoga* and Indian-religion modern bodybuilding.

- XCII. In 2020, I was prescribed, but not diagnosed with a disease because of the technology factor, with various medications to counter the stress weapon's effects.
- XCIII. On December 14, 2020, I took a lie detector test, to show that I am not making this up. *See* Exhibits A-C.
- XCIV. The stress weapon remains operating, and the situation with the repeating of word patterns is also on-going.
- XCV. In October 2021, I entered a complaint in the Court of Federal Claims.
- XCVI. On November 5, 2021, the Court of Federal Claims dismissed the complaint for want to subject-matter jurisdiction and failure to state a claim upon which relief can be granted. *Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. 2022), Dkt. 10.
- XCVII. In February 2022, the Court of Appeals for the Federal Circuit entered a per curium order which partially overturned the Court of Federal Claims. *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022), ECF 31.
- XCVIII. This complaint follows.

### CLAIMS

All paragraphs from above are incorporated into this section.

- One. **Breach of Contract – The United States breached the contract it and I entered into about living under the stress weapon so the United States – and I – can learn about this terrorism and its goals, with my damages to be paid to me.**
- a. The contract was entered into under T.H., T.H., T.H. (T.E.) Bush's presidency, as described in paragraphs VI and IX.
  - b. Each President repeats my word patterns after making contact with them and asking them to communicate back.

- c. T.H., T.H., T.H. (T.E.) Obama verified the contract, while he was on the campaign trail, and throughout his terms as described in paragraphs XIV, XXVII(K), XXIX, and XXXI.
- d. T.H. (T.E.) Trump verifies the contract, as mentioned in paragraphs XL, LVI (especially sign language), LX, LXV, and LXXVIII. The contract is breached when I exceed the amount of weight when I would have excess skin from weight gain, as mentioned in paragraph LXXIV.
- e. T.H., T.H. (T.E.), T.H. (T.E.) Biden is sworn in and affirms the contract, after I contact him via [www.whitehouse.gov](http://www.whitehouse.gov), as mentioned in paragraphs LXXX, LXXXI, LXXXII, and LXXXVI.
- f. Relief:
  - i. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.
  - ii. Promissory Estoppel.

Two. **Establishment of Religion – The United States established religion when it omitted to protect me from the terrorist who was dressed as a Hindu goddess and made me live through tortious technology.**

- a. *See generally* paragraphs, especially paragraphs LV(A), (B), & (F), and XCI, and note 4.



- b. Monroe Doctrine (1823) as extended to Her Majesty's Commonwealth of Nations – Great Britain and India (constituted as the “Sovereign Socialist Secular Democratic Republic”) and [https://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/PV.8452](https://www.un.org/en/ga/search/view_doc.asp?symbol=S/PV.8452); National Security Advisor John Bolton invoked the Monroe Doctrine in describing the Trump administration's policy in the Americas, saying “In this administration, we're not afraid to use the word Monroe Doctrine...It's been the objective of American presidents going back to [President] Ronald Reagan to have a completely democratic hemisphere,” <https://www.washingtonexaminer.com/news/john-bolton-were-not-afraid-to-use-the-word-monroe-doctrine>.

- i. United Kingdom's Religion: Long Live The Queen!
  - ii. India's Religion: Long Live Mother India!
- c. The United States Constitution is itself a contract, e.g. by the governed and the government. *See generally* U.S. const., art. VI, § 1 & amend. I and Decl. of Independence (1776).
- d. Relief:
- i. 5 U.S.C. §§ 702 & 706.
  - ii. 42 U.S.C. §§ 1981 & 1983.
  - iii. 42 U.S.C. § 2000bb-1(c).
  - iv. 28 U.S.C. §§ 1491(a)(1)-(2).

Three. **42 U.S.C. § 2000bb-1 – The United States substantially burdened my right to be re-admitted to the University of Notre Dame Law School when it did not protect my right of Free Exercise of Religion and/or Expression by allowing agents of**

**the United States or terrorists or other unconstitutional act to prevent me from exercising, attending school, and interfering with the religious-side of my physical brain by placing the stress weapon and stress noise there.**

- a. Paragraphs LXXXIII, LV(A), (B), & (F), and XCI and note 4.
- b. U.S. const., amend. I.
- c. Relief:
  - i. 42 U.S.C. § 2000bb-1(c), and
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

Four. **President's Vested Powers – In my personal capacity, each President violated his oath of office when he did not preserve, protect, and defend the Constitution and its amendments, in my situation of peril.**

- a. *See generally* paragraphs.
- b. Constitution itself is a contract with the American people.
- c. The President's vested executive powers allowed each President to enter into the contract of interest and his oath requires that he preserve, protect and defend the Constitution of the United States, which includes its amendments, including Amendments I, IV, VIII, XIII, and XIV.

- d. The vested powers are conditional upon The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const., art. VI, §1.
- e. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. \_\_\_\_ (2021) (the executive power is to remain accountable to the people).
- f. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Five. **President's Vested Powers – In my official capacity (ies), each President violated his oath of office when he did not preserve, protect and defend the Constitution and its amendments, in my situation of peril, and thus did not faithfully execute the office of the United States Presidency.**

- a. *See generally* paragraphs.
- b. Constitution itself is a contract with the American people.
- c. The President's vested executive powers allowed each President to enter into the contract of interest and his oath requires that he preserve, protect and defend the Constitution of the United States, which includes its amendments.
- d. The vested powers are conditional upon The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const., art. VI, §1.
- e. *Wood v. Moss*, No. 13-115, p. 5 & 16, 572 U.S. 744 (2014) orders that "substantive content" of the message, including political, is evaluated when

there is a “security risk” of an elected or appointed official and that immunity applies for enforcement of limiting speech. *See also Rubin v. United States*, 525 U.S. 990, 990-991 (1998) (Breyer, J., dissenting from denial of certiorari) (“The physical security of [an honorable] has a special legal role to play in our constitutional system.”).

- f. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. \_\_\_\_ (2021) (the executive power is to remain accountable to the people).
- g. Full Faith and Credit Clause, which gives me constitutional right not to be battered or immunity, and Oath of President’s Office requires that the vested powers be used in a certain way.
- h. Absolute sovereign immunity is not applicable to T.H. President of the United States to T.E. Student Body President T.E. Student Body President Raj Patel, as T.E. is precedent.
- i. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Six. **Take Care Clause – I detrimentally relied on each President taking care that the laws be faithfully executed, if there is no contract, and that I would be free from the stress weapon.**

- a. *See generally* paragraphs.
- b. Constitution is a social contract itself.
- c. Constitution is a contract with each corporate office or body politic within the Lockean-Machiavelli set up.
- d. U.S. const., amend. V-Due Process.

- e. The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const., art. VI, §1.
- f. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).
  - iii. Promissory Estoppel.

Seven. **Preceding Clause – The United States violated Article VI, Section 1 of the United States Constitution when it did not protect me from the psycho-bio-tech stress-depression weapon and violated my inalienable right life, liberty, and the pursuit of happiness and breached security of peace and harmony.**

- a. *See generally* paragraphs, especially paragraphs XXVII, XLVI, LVIII, & LXIV.
- b. Article VI, § 1 of the United States Constitution refers to the Declaration of Independence (1776), the Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and other Founding Documents.
- c. I detrimentally relied on the President of the United States, the Department of Justice, the Federal Bureau of Investigations, and other departments and bureaus to restore my constitutional guarantee and let me live my life.
- d. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Eight. **Privileges and/or Immunities Clause – The United States violated the privileges and immunities clause in the original constitution and the privileges and immunities clause in the 14<sup>th</sup> Amendment when it left me in peril or this situation after I attained my first student government presidency of the B.C.S.C. and thereafter as student government president of Emory University, Inc.**

- a. *See generally* paragraphs.
- b. As mentioned in Grievance 21, Decl. of Independence (1776), the Treaty of Paris (1783), and U.S. const., art. VI, § 1, I have constitutional immunity as The Excellent and The Excellent from weapons of the United States. I also have the privilege of knowing what caused the peril.
- c. Grievance 21, Decl. of Independence (1776) and U.S. const., art. VI, § 1 explain what the president's and executive's vested powers must be used for and what faithfully execute the office of the presidency means.
- d. *Slaughter-House Cases*, 83 U.S. (16 Wall.) 36, 71, and 77-78 (1873) ("the clause was interpreted to convey limited protection pertinent to a small minority of rights, such as the right to seek federal office"; privileges of other "butchers," applied as well to students, student government presidents, and incumbent and former elected and appointed officials) (but privileges for elected or appointed officials who are not citizens of a state or the United States would not have the privileges of that office, i.e. executive privilege not applicable) (natural-born would have the precedent over naturalized for the same office).
- e. The Supreme Court, in *Corfield v. Coryell*, 6 F. Cas. 546 (1823), also states that the Privileges and Immunities Clause, United States Constitution Article

IV, Section 2, Clause 2 also includes the “Protection by the government; the enjoyment of life and liberty, *with the right to acquire and possess property of every kind*, and to pursue and obtain happiness and safety; subject nevertheless to such restraints as the government may justly prescribe for the general good of the whole.” *Corfield v. Coryell*, 6 F. Cas. 546 (1823) (Washington, J.) (emphasis added) and U.S. const. art. IV, § 2, cl. 2 (“Privileges & Immunities Clause”); *see also* U.S. const. amend. XIV, § 1 (“Privileges or Immunities Clause”) and 42 U.S.C. §§ 1981-1983.

- f. On July 12, 1816, Thomas Jefferson said to Samuel Kercheval, also known as H. Tompkinson, the following, which advocates for remedying the use of psychological weapons, such as the stress weapon:

- i. I am certainly not an advocate for frequent and untried changes in laws and constitutions. I think moderate imperfections had better be borne with; because, when once known, we accommodate ourselves to them, and find practical means of correcting their ill effects. But I know also, that laws and institutions must go hand in hand with the progress of the human mind. As that becomes more developed, more enlightened, as new discoveries are made, new truths disclosed, and manners and opinions change with the change of circumstances, institutions must advance also, and keep pace with the times. We might as well require a man to wear still the coat which fitted him when a boy, as civilized society to remain ever under the regimen of their barbarous ancestors. Thomas Jefferson to Samuel Kercheval. *The Thomas Jefferson Papers at the Library of Congress*, Series 1: General

Correspondence 1651 to 1827, Retrieved from the Library of Congress, <https://www.loc.gov/item/mtjbib022494/>.

g. Relief:

- i. 5 U.S.C. §§ 702 & 706.
- ii. 18 U.S.C. § 242.
- iii. 28 U.S.C. §§ 1491(a)(1)-(2).
- iv. 42 U.S.C. §§ 1981-1983.

**Nine. Equal Protection Clause – The United States violated the Equal Protection Clause in the Fifth Amendment Due Process Clause to reinstate its protection over me.**

- a. *See generally* paragraphs.
- b. *Bolling*, 347 U.S. at 497 cited in *Windsor*, 570 U.S. at 804 (discussing equal protection under the Fifth Amendment).
- c. U.S. const., amend. V.
  - i. Equality – I was treated not fairly differently in Fair Play of Due Process of each material moment in the supply chain.
  - ii. Equity – I earned the protection of the United States after attaining two political offices.
- d. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).
  - iii. 42 U.S.C. §§ 1981-1983.

**Ten. Right of Privacy – The United States violated my privacy when it searched and seized my word patterns and then disseminated those same word patterns.**



- a. *See generally* paragraphs.
- b. *Lange*, No. 20-18 at p 21, 594 U.S. at \_\_\_\_ (2021) (castle doctrine creates an impenetrable shield against others).
- c. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).
  - iii. 42 U.S.C. §§ 1981-1983.

Eleven. **Taking – The United States took my property when it took my verbatim word patterns and used it in the speeches of elected officials and news anchors.**

- a. *See generally* paragraphs, including, but not limited to, paragraph LXXV.
- b. Nonetheless, my verbatim word patterns were taken from me, but if they were taken for public use, including but not limited to disciplinary or correctional efforts, I did not have “just compensation,” pursuant to the Fifth Amendment or the Fourteenth Amendment of the United States Constitution. U.S. const., amend. V & XIV. Theft or taking also necessitates a breach of the Fourth Amendment. U.S. const., amend. IV.
- c. *See also United States v. Lee*, 106 U.S. 196, 220 (1882) (Miller, J.).
- d. Immunity is not applicable to Takings and each President’s individual capacities.
- e. Relief:
  - i. U.S. const., amend. V. (“just compensation”).
  - ii. 5 U.S.C. §§ 702 & 706.
  - iii. 18 U.S.C. § 242.
  - iv. 28 U.S.C. §§ 1491(a)(1)-(2).

v. 42 U.S.C. §§ 1981-1983.

Twelve. **Full Faith and Credit Clause** – The United States violated the Full Faith and Credit Clause when it left me in peril or this situation after I attained my first student government presidency of the B.C.S.C. and thereafter as student government president of Emory University, Inc., therefore, disrespecting my “public Act[s],” which are magistrate positions and give me the style of “The Excellent.”

- a. *See generally* paragraphs.
- b. This Clause gives me a constitutional right not to be battered or assaulted with taxpayer resources.
- c. I felt like that my rights as a co-leader from The Declaration of Independence (U.S. 1776) (i.e. right to represent in a charter and freedom from interference in a charter) and my rights as a student from the Declaration of Independence (1776) (i.e. right to be represented in a charter) were violated, which are fundamentally essential for my “[S]afety and [H]appiness.” The Declaration of Independence (U.S. 1776). U.S. const., art. VI, § 1.
- d. The Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783) (full faith should be given). U.S. const., art. VI, § 1.
- e. The President is contracted via the United States Constitution with each of these political positions to protect and defend. Hence, absolute sovereign immunity is not applicable to T.H. President of the United States to T.E. Student Body President T.E. Student Body President Raj Patel, as T.E. is precedent. Presidents of the United States Biden, Trump, Bush and Obama each waived immunity, just in case, applicable to happenings, through a

detailed conversation with friend and then-to-be-Class President, and with communication through television with President Trump and President Biden. Contract Cl., U.S. const. Immunity is applicable in civil matters (acts but not inactions), not these criminal and civil-crime matters, and legislatively waived. *See also* 18 U.S.C. §§ 241-242 and 42 U.S.C. §§ 1981-1984 and 18 U.S.C. §§ 1346, 1951 & 1961. U.S. const., art. VI, § 1 and Grievance 21, Decl. of Independence (1776). Counter weapons have also been unduly preempted. U.S. const., amend. II.

f. Relief:

- i. 5 U.S.C. §§ 702 & 706.
- ii. 28 U.S.C. §§ 1491(a)(1)-(2).
- iii. 42 U.S.C. §§ 1983.
- iv. 42 U.S.C. § 2000bb-1(c).

Thirteen. **Thirteenth Amendment – The United States allowed for slavery, despite me relying on the preexisting social contract, the United States Constitution, that the President or another officer of the United States would perform their constitutional contractual duty to free me from this on-going slavery.**

- a. *See generally* paragraphs, especially paragraph LVII.
- b. “Slavery” in Merriam-Webster.com Dictionary (1828) (“submission to a dominating influence”).
- c. *See also* 42 U.S.C. §§ 1981(a)-(c) (“Equal rights under the law”), 1982 (“Property rights of citizens”) & 1983 (“Civil action for deprivation of rights”).
- d. *See also* 18 U.S.C. § 242.
- e. Relief:

- i. 5 U.S.C. §§ 702 & 706.
- ii. 18 U.S.C. § 2383.
- iii. 28 U.S.C. §§ 1491(a)(1)-(2).
- iv. 42 U.S.C. § 1983.
- v. 42 U.S.C. § 2000bb-1(c).

Fourteen. **Due Process – The United States let my Fair Play in Commerce be violated while I was a student at B.C.S.C., Emory University, and the University of Notre Dame Law School, while sitting for my various standardized and admissions tests, and while I was partaking in other things preparing for the workforce.**

- a. *See generally* paragraphs.
- b. U.S. const., amend. V. & art. I, § 8.
- c. 42 U.S.C. §§ 2000a(c) & 2000a-2.
- d. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).
  - iii. 42 U.S.C. § 1983.

Fifteen. **Treaty of Paris (1783) – The United States violated the Treaty of Paris by not protecting me with its conditionally transferred sovereignty to maintain peace and harmony in my environs.**

- a. *See generally* paragraphs.
- b. *See* U.S. const., art. VI, § 1.
- c. Relief:
  - i. 5 U.S.C. §§ 702 & 706.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. § 1983.

Sixteen. **18 U.S.C. § 241 – The United States, its delegates, including teachers, faculty, and deans, and the Brownsburg Police Department conspired to “oppress” or “deprive” or “threaten” me of right of Free Exercise of Religion by causing unwanted changes in academic and physical and social performance.**

- a. *See generally* paragraphs.
- b. Conspiracy, overt act not required.
- c. Relief:
  - i. 18 U.S.C. § 242.
  - ii. 42 U.S.C. § 2000bb-1(c), and
  - iii. 28 U.S.C. § 1491(a)(1)-(2).

Seventeen. **18 U.S.C. § 242 – The United States deprived me of my right of religious free exercise because of my pornography videos I made, which countered the stress weapon, taking support away from “boots on the ground.”**

- a. *See generally* paragraphs.
- b. Relief:
  - i. 18 U.S.C. § 242.
  - ii. 42 U.S.C. § 2000bb-1(c), and
  - iii. 28 U.S.C. § 1491(a)(1)-(2).

Eighteen. **18 U.S.C. § 247(a)(2) – The United States deprived me of my right of religious free exercise because of my pornography videos I made, which countered the stress weapon, taking support away from “boots on the ground.”**

- a. *See generally* paragraphs.
- b. Relief:

- i. 18 U.S.C. § 242.
- ii. 42 U.S.C. § 2000bb-1(c), and
- iii. 28 U.S.C. § 1491(a)(1)-(2).

Nineteen. **18 U.S.C. § 241 – The United States, its delegates, including teachers, faculty, and deans, and the Brownsburg Police Department conspired to “oppress” or “deprive” me of my privileges and immunities secured to me by the United States Constitution after attaining each of my political offices as student government president of the B.C.S.C. and Emory University, Inc.**

- a. *See generally* paragraphs.
- b. Conspiracy, overt act not required.
- c. Relief:
  - i. 18 U.S.C. § 241.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty. **18 U.S.C. § 247(a)(2) – The United States and The University of Notre Dame intentionally obstructed, by force, Plaintiff in the enjoyment of his free exercise of religious beliefs, or attempted to do so, by using the psycho-bio-tech weapon with white rings/disks which caused a significant change in physical exercising and dieting and professional commitment.**

- a. *See generally* paragraphs, especially paragraph I, XXII, LV, XXVII(A)-(C), XCI, and XCII.
- b. *See supra*, note 4.
- c. Relief:
  - i. 18 U.S.C. § 247(d).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-one. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by changing my commercial output by robbing or extorting me of my personal property right to attend specific colleges and law schools and committed physical violence towards me.**

- a. *See generally* paragraphs.
- b. Conspiracy, overt act not required.
- c. Relief:
  - i. 18 U.S.C. § 1951(a).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-two. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by changing my transcript, an article or commodity of commerce, by robbing or extorting or conspiring to rob or extort me of my personal property right to attend specific colleges and law schools and committed physical violence towards me.**

- a. *See generally* paragraphs.
- b. Relief:
  - i. 18 U.S.C. § 1951(a).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-three. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by robbing or extorting or conspiring to rob or extort me of my verbatim word patterns and inserting them into news anchors, movies, and soap operas.**

- a. *See generally* paragraphs.
- b. Relief:
  - i. 18 U.S.C. § 1951(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-four. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by robbing or extorting or conspiring to rob or extort me of my verbatim word patterns related to COVAID-19 asymptomatic patients while at the Trump International Hotel.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 1951(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-five. **18 U.S.C. § 1341-51 – The United States devised or intended to devise a scheme or artifice to defraud me of its protection by using signs, signals, pictures, and sound on internet wire and on cable television.**

a. *See generally* paragraphs.

b. Produced arbitrary undergraduate and law school admissions results because of this stress-weapon that is controlled by the United States intervened and lowered the merit on the application.

c. The transfer of word / data can be happening through, including but limited to, beaming (e.g., satellite, radio, soundwaves, etc.) or wire (e.g. internet, telecommunications, etc.).

d. No intention of freeing me of the terrorism.

e. Relief:

i. 28 U.S.C. §§ 1491(a)(1)-(2).

ii. 18 U.S.C. §§ 1341 & 1343.



- Twenty-six. **Tortious interference with business transaction – The United States interfered with my contract with the University of Notre Dame and Emory University when it allowed for a stress weapon to be repeatedly and continuously be used on me.**
- a. *See generally* paragraphs.
  - b. Relief: 28 U.S.C. §§ 1491(a)(1)-(2).
- Twenty-seven. **42 U.S.C. § 9501(2)(A) – The United States recklessly violated the Mental Health Bill of Rights when it did not make sure that the State of Indiana was using the least restrictive means when putting individuals on emergency detention.**
- a. *See generally* paragraphs.
  - b. Relief:
    - i. 18 U.S.C. § 242.
    - ii. 42 U.S.C. § 2000bb-1(c), and
    - iii. 28 U.S.C. §§ 1491(a)(1)-(2).
- Twenty-eight. **42 U.S.C. § 1981 – In my personal capacity, the United States did not give me full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and subject me to like punishment, pains, penalties, taxes, licenses, and exactions of every kind.**
- a. *See generally* paragraphs.
  - b. Relief:
    - i. 18 U.S.C. § 242.
    - ii. 18 U.S.C. § 2383.
    - iii. 42 U.S.C. § 1983.
    - iv. 42 U.S.C. § 2000bb-1(c), and

v. 28 U.S.C. §§ 1491(a)(1)-(2).

Twenty-nine. **42 U.S.C. § 1981 – In my official capacity(ies), the United States did not give me full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and subject me to like punishment, pains, penalties, taxes, licenses, and exactions of every kind.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 241.

ii. 42 U.S.C. § 1983.

iii. 42 U.S.C. § 2000bb-1(c), and

iv. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty. **18 U.S.C. § 2441(d)(1) – The United States and the entity using the psycho-bio-tech stress weapon committed a war crime of torture by inducing mental pains, cruel or inhuman treatment, performing biological experiments, or intentionally causing serious bodily injury.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 2441(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. § 1983.

Thirty-one. **18 U.S.C. § 175 – The United States unlawfully retains a biological weapon (i.e. the psycho-bio-tech stress weapon) or conspired with another organization to same.**

- a. *See generally* paragraphs, especially paragraphs, I, XXII, LV, XXVII(A)-(C), and XCII.
- b. Relief:
  - i. 18 U.S.C. § 175(a).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-two. **18 U.S.C. § 229 – The United States used a chemical weapon to the extent not permissible by law against me.**

- a. *See generally* paragraphs, especially paragraph I, XXII, LV, XXVII(A)-(C), and XCII.
- b. Relief:
  - i. 18 U.S.C. § 229A(a)-(b).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-three. **18 U.S.C. § 1832 – The United States took and distributed my trade secrets, my word patterns, for political service intended in interstate commerce, including for my service as each student government president in B.C.S.C. and Emory University, Inc.**

- a. *See generally* paragraphs.
- b. Relief:
  - i. 18 U.S.C. § 1832(b).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-four. **18 U.S.C. § 1961 – The United States is an aider and abettor in a R.I.C.O. conspiracy through extortion, honest services fraud, biological weapons, and chemical weapons.**

- a. *See generally* paragraphs.

- i. Extortion – 18 U.S.C. § 1961.
  - ii. Honest services fraud – 18 U.S.C. § 1343.
  - iii. Biological weapon – 18 U.S.C. § 175.
  - iv. Chemical weapon – 18 U.S.C. § 229.
- b. *Asahi*, 480 U.S. at 102 (supply-chain terrorism and stream of commerce terrorism; transcripts; (fair) playing in Commerce). RICO takes form of extortion (i.e. threats with the use of biological weapon to quite school and/or political and/or law), wire fraud (beaming of communications and sound-waves) (18 U.S.C. § 1343), intimidating someone in Commerce (schools/ transcripts) (18 U.S.C. § 1951), use of biological weapon (stress weapon/bio-tech brain wiring) (18 U.S.C. § 175), use of chemical weapon (18 U.S.C. § 229), and racketeering (18 U.S.C. § 1952).
- c. RICO is evaluated under a distinct precedent, *H.J. Inc.*, 492 U.S. at 248-250 (citations omitted).
- d. Relief:
  - i. 18 U.S.C. §§ 1963-64.
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-five. **18 U.S.C. §§ 1091(a)(3)-(5) – The United States conducted genocide against a substantial part, i.e. one elected official is a substantial part, of my respective national, ethnic, racial, or religious group.**

- a. *See generally* paragraphs.
- b. Relief:
  - i. 18 U.S.C. § 1091(b)(2).
  - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-six. **Extreme Emotional Distress – The United States caused extreme emotional distress by leaving me unattended of its constitutional protection.**

- a. Overall, since November 2017, I have taken unplanned and unwanted time off of law school which unduly and unwantedly effects my career timeline and unjustly limits my career choices, which all also causes me extreme emotional distress
- b. *See generally* paragraphs.
- c. Relief: 28 U.S.C. §§ 1491(a)(1)-(2) - \$3.76B.

Thirty-seven. **Promissory Estoppel – I detrimentally relied on the United States in upholding its contract with me when I used the method in approaching this situation.**

- a. *See generally* paragraphs.
- b. Relief: 28 U.S.C. §§ 1491(a)(1)-(2) - \$3.76B.

### **DEMAND FOR RELIEF**

WHEREFORE, The Excellent, The Excellent Raj K. Patel, with the interest of upholding the contract with the United States and the Constitution, asks this District Court for the Eastern District of Pennsylvania to enter judgement in his favor and grant either all or some of the following relief<sup>19</sup>:

1. Relief described in the claims section above.
2. Give respective orders to fulfill the statutory and constitutional obligations required to me, including but not limited to *writ of mandamus* and a *writ quo warranto*.  
28 U.S.C. §§ 1491(a)(1)-(2). 28 U.S.C. §§ 1651. 18 U.S.C. §§ 1964-1968.

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19. *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*) (To recover against the government, a plaintiff must identify a “substantive right created by some money-mandating constitutional provision, statute or regulation that has been violated, or an express or implied contract with the United States.”).

3. Enforcement and application of the privileges and immunities clauses and Full Faith and Credit Clauses. 28 U.S.C. §§ 1491(a)(1)-(2). 18 U.S.C. §§ 241 *et seq.* See generally *Arthrex, Inc.*, 594 U.S. \_\_\_\_ (2021). See attached proposed orders.
4. Rectify academic information. 28 U.S.C. §§ 1491(a)(1)-(2). 18 U.S.C. §§ 1967.
5. Order Plaintiff into the law school of his choice, along with the order to require the law school to graduate Plaintiff with their J.D. degree. 28 U.S.C. §§ 1491(a)(1)-(2). See general reconstruction powers. *Brown v. Board of Education of Topeka II*, 349 U.S. 294 (1955) (courts may enforce school enrollment “with all deliberate speed.”).
6. Award earned damages totaling multimillion or billions – \$330M - \$3.76B<sup>20</sup> – solely based on the horizontal trickle effect, including stream of Commerce; steps of organized playing in Commerce, per the contract. 28 U.S.C. §§ 1491(a)(1)-(2). Due Process. Commerce Clauses. 18 U.S.C. §§ 1964-1968. U.S. const., amend. V.
7. General order to seize all unlawful force over me. 28 U.S.C. § 1491(a)(1)-(2). 28 U.S.C. §§ 1651.
8. Order Plaintiff back into the Notre Dame Law School to complete course of study for his J.D. candidacy, within the minimum time required, 1.2667 semesters. 28 U.S.C. §§ 1491(a)(1)-(2) and *Brown II*, 349 U.S. at 294 (courts may enforce school enrollment “with all deliberate speed.”). See also 28 U.S.C. § 1631.
9. Briefing on the bio-tech weapon, including effects and risks on regressive human evolution of Plaintiff and Plaintiff’s descendent, as all adversity impacts human evolution, and medicine/weaponry for forward-evolution. The antidote would be

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20. The settlement agreed with the Presidents of the United States is over \$330M for the battery with the bio-tech stress weapon, plus \$1M per pound gained (187lbs gained from 150lbs, 337) which is \$187M + time to lose weight + \$1B for lose in career + \$1B for college and law school application discrimination and unduly lowering the merit + reputational damages, including, but not limited to, my legitimacy + other consequential damages.

top-top secret or under lesser security clearances. 28 U.S.C. §§ 1491(a)(1)-(2). Due Process.

10. Award value of contracted money. 28 U.S.C. §§ 1491(a)(1)-(2).
11. Re-distribution of advance weaponry to me, for Safety and Happiness. U.S. const., art. IV, §§ 1 & 2, cl. 1 & art. III, § 1.
12. Other remedies which the court might deem fit, including because of the attack on my celebrity. 28 U.S.C. §§ 1491(a)(1)-(2). 5 U.S.C. §§ 702 & 706. 18 U.S.C. §§ 1964-1968.
13. If this court answers the questions in favor of me, the Plaintiff, then suspend jurisdiction on this case until the United States Supreme Court has a change to release its decision and possibly remand to the ongoing litigation to this court. *TE TE Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021), *aff'd on other grounds*, No. 22-1131 (Fed. Cir. 2022)

Respectfully submitted,

/s/ Raj K. Patel  
T.E., T.E. Raj K. Patel (*pro se*)  
6850 East 21<sup>st</sup> Street  
Indianapolis, IN 46219  
Marion County  
317-450-6651 (cell)  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
[www.rajpatel.live](http://www.rajpatel.live)

J.D. Candidate, Notre Dame L. Sch. (2015-2017)  
President/Student Body President, Student Gov't Ass'n of  
Emory U., Inc. 2013-2014 (corporate sovereign 2013-  
present)

Student Body President, Brownsburg Cmty. Sch.  
Corp./President, Brownsburg High Sch. Student Gov't  
2009-2010 (corporate sovereign 2009-present)  
Rep. from the Notre Dame L. Sch. Student B. Ass'n to the  
Ind. St. B. Ass'n 2017  
Deputy Regional Director, Young Democrats of Am.-High  
Sch. Caucus 2008-2009  
Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-  
2010  
Vice President of Fin. (Indep.), Oxford C. Republicans of  
Emory U., Inc. 2011-2012



### CERTIFICATE OF INTEREST

I, THE EXCELLENT, THE EXCELLENT Raj K. Patel (pro se), am appearing without counsel, like I did in the courts below. Giving Full Faith to the United States Constitution, I use the Authority of my omnipresent Styles and Office in these proceedings into which I avail myself. U.S. const. art. IV, § 1 & amend. XIV, & art. VI, § 1 referring to the Treaty of Paris (1783) & Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

I have completed five (5) out of the six (6) semesters of my juris dr. candidacy at the U. of Notre Dame L. Sch. in South Bend, IN., where I was enrolled from August 2015 to November 2017, and I have completed sixty-eight (68) out of the ninety (90) credit hours for a juris dr. candidacy at the Notre Dame L. Sch.

Such, I have completed the minimum number of credit hours required by the accrediting Am. B. Ass’n (“A.B.A.”) to allow a law school to accredit me a juris dr. degree.

Amongst the grades in my juris dr. academic courses I received at the Notre Dame L. Sch., I received an A-/A in contracts law, an A-/A in civil procedure, and a B/A in constitutional law, while under Weapon S. In the summer of 2016, I worked as summer associate with the City of Atlanta Law Department in Atlanta, GA. In the summer of 2017, I worked as a summer associate at Barnes & Thornburg LLP in Indianapolis, IN.

And, I hold a Bachelor of Arts in Poli. Sci. and *cum laude* in Religion from Emory U., Inc. of Atlanta, Georgia, and I attended both Oxford College and Emory College, and graduated, in 2014, with a 3.718/4.0 grade point average with no pass/fail grades.

Emory U., Inc. is ranked as a top-20 or top-25 *U.S. News* Tier 1 best national university, and the Notre Dame L. Sch. is ranked as a *U.S. News* Top 25 best law school in the United States.

I was Student Body President of the Brownsburg Cmty. Sch. Corp. from 2009-2010 and Student Body President of Emory U., Inc. from 2013-2014. I was also the Notre Dame L. Sch. Student B. Ass’n Rep. to the Ind. State B. Ass’n from September 2017 to November 2017. All jurisdictions are “local” and with an “international” constituency.

Each time I was elected Student Body President, I attained thenceforth omnipresent Styles (“THE EXCELLENT” for each election) which are protected by both the Privileges & Immunities Clause and Privileges or Immunities Clause of the United States Constitution. U.S. const. art. IV, § 2, cl. 1 & amend. XIV, § 1, cl. 2. *See generally* Federalist 80 & *Printz v. United States*, 521 U.S. 898, 918 (1997) quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934).

I am well read in the material law. I have not received legal advice or counsel from anyone else for this case.

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

### 28 U.S.C. § 1491 – Claims against United States generally

- (a)
- (1) The United States Court of Federal Claims shall have jurisdiction to render judgment upon any claim against the United States founded either upon the Constitution, or any Act of Congress or any regulation of an executive department, or upon any express or implied contract with the United States,<sup>[21]</sup> or for liquidated or unliquidated damages in cases not sounding in tort...
  - (2) To provide an entire remedy and to complete the relief afforded by the judgment, the court may, as an incident of and collateral to any such judgment, issue orders directing restoration to office or position, placement in appropriate duty or retirement status, and correction of applicable records, and such orders may be issued to any appropriate official of the United States. In any case within its jurisdiction, the court shall have the power to remand appropriate matters to any administrative or executive body or official with such direction as it may deem proper and just. The Court of Federal Claims shall have jurisdiction to render judgment upon any claim by or against, or dispute with, a contractor arising under section 7104(b)(1) of title 41, including a dispute concerning termination of a contract, rights in tangible or intangible property, compliance with cost accounting standards, and other nonmonetary disputes on which a decision of the contracting officer has been issued under section 6 of that Act.

[underline added]

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21. “The United States, as sovereign, is immune from suit save as it consents to be sued.” *United States v. Sherwood*, 312 U.S. 584, 586 (1941). The waiver of immunity “must be ‘unequivocally expressed.’” *United States v. White Mountain Apache Tribe*, 537 U.S. 465, 472 (2003) (quoting *United States v. Mitchell*, 445 U.S. 535, 538 (1980)). The Big Tucker Act, 28 U.S.C. § 1491(a), the principal statute governing the jurisdiction of this case originating in the Court of Federal Claims, waives sovereign immunity for claims against the United States, not sounding in tort, that are founded upon the United States Constitution, a federal statute or regulation, or an express or implied contract with the United States. *Schneiter v. The United States*, No. 21-1876C (C.F.C. Apr. 7, 2022); 28 U.S.C. § 1491(a)(1); *White Mountain Apache*, 537 U.S. at 472. However, the Big Tucker Act is merely a jurisdictional statute and “does not create any substantive right enforceable against the United States for money damages.” *United States v. Testan*, 424 U.S. 392, 398 (1976). Instead, the substantive right must appear in another source of law, including but not limited to “an express or implied-in-fact contract” or a money-mandating...statute. *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*). Cf. *Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021), *aff’d on other grounds*, No. 22-1131 (Fed. Cir. 2022), *pending cert.*, No. \_\_\_\_\_ (U.S. 202\_) citing *United States v. Navajo Nation*, 556 U.S. 287, 290 (2009) (applicable to contracts under money-mandating statutes).

## 28 U.S.C. § 2517 – Payment of judgments

- (a) Except as provided by chapter 71 of title 41, every final judgment rendered by the United States Court of Federal Claims against the United States shall be paid out of any general appropriation therefor, on presentation to the Secretary of the Treasury of a certification of the judgment by the clerk and chief judge of the court.
- (b) Payment of any such judgment and of interest thereon shall be a full discharge to the United States of all claims and demands arising out of the matters involved in the case or controversy, unless the judgment is designated a partial judgment, in which event only the matters described therein shall be discharged.

[underline added]

## 28 U.S.C. § 1651 – Writs

- (a) The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.
- (b) An alternative writ or rule nisi may be issued by a justice or judge of a court which has jurisdiction.

## 42 U.S.C. § 2000bb–1 – Free exercise of religion protected

- (a) **IN GENERAL** - Government shall not substantially burden a person’s exercise of religion even if the burden results from a rule of general applicability,<sup>22</sup> except as provided in subsection (b).
- (b) **EXCEPTION** - Government may substantially burden a person’s exercise of religion only if it demonstrates that application of the burden to the person—
  - (1) is in furtherance of a compelling governmental interest; and
  - (2) is the least restrictive means of furthering that compelling governmental interest.

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22. “Failing either the neutrality or general applicability test is sufficient to trigger strict scrutiny, under which the government must demonstrate its course was justified by a compelling state interest and was narrowly tailored in pursuit of that interest.” *Kennedy v. Bremerton School Dist.*, No. 21-418 \* 12 (U.S. June 27, 2022) (internal citations omitted) (Gorsuch, J., majority). “The Free Exercise Clause and Establishment Clause are equally integral in protecting religious freedom in our society. The first serves as “a promise from our government,” while the second erects a “backstop that disables our government from breaking it” and “start[ing] us down the path to the past, when [the right to free exercise] was routinely abridged.” *Id.* \* 34-35 (Sotomayor, J., dissenting) quoting *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 582 U. S. \_\_\_, \_\_\_ (2017) (Sotomayor, J., dissenting) (slip op., at 26).



manner in which such acts, records, and proceedings shall be proved, and the effect thereof.

[underline added]

#### 42 U.S.C. § 1981 - Equal rights under the law

(a) **STATEMENT OF EQUAL RIGHTS**

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

(b) **“MAKE AND ENFORCE CONTRACTS” DEFINED**

For purposes of this section, the term “make and enforce contracts” includes the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.

(c) **PROTECTION AGAINST IMPAIRMENT**

The rights protected by this section are protected against impairment by non-governmental discrimination and impairment under color of State law.

[underline added]

#### Judicial Opinions

There is no requirement that the express contract-in-fact be money mandating or mandating of compensation under the Big Tucker Act or judicial opinions. *United States v. Testan*, 424 U.S. 392, 398 (1976); *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*). Cf. *TE TE Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021), *aff’d on other grounds*, No. 22-1131 (Fed. Cir. 2022), *pending this cert.*, No. \_\_\_\_ (U.S. 202\_). It is a “judicially-imposed requirement that [contracts] in question be money-mandating.” *Higbie v. United States*, 778 F.3d 990, 992 (Fed. Cir. 2015).

### CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing filing on 07/02/2022 by the method in brackets on the below individuals at the following locations:

The Honorable Joe Biden (whitehouse.gov)  
President of the United States  
1600 Pennsylvania Ave. N.W.  
Washington, D.C. 20500

The Honorable Merrick Garland (e-mail/website)  
United States Attorney General  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530  
[Merrick.Garland@usdoj.gov](mailto:Merrick.Garland@usdoj.gov)

Marina M. Kozmycz, Associate Gen. Counsel (e-mail)  
The E.O.P. at the White House  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500  
Phone: 202-457-1414  
[Marina.M.Kozmycz@oa.eop.gov](mailto:Marina.M.Kozmycz@oa.eop.gov)

Elizabeth B. Prelogar (e-mail)  
Office of the Solicitor General  
United States Department of Justice  
950 Pennsylvania Ave., NW, Rm. 5616  
Washington, D.C. 20530-0001  
[SupremeCtBriefs@usdoj.gov](mailto:SupremeCtBriefs@usdoj.gov)

Robert Ralph Kiepura, Trial Attorney (e-mail)  
U.S. Dep't of Justice - Civil Div. (G)  
P.O. Box 480, Ben Franklin Station  
Washington, DC 20044  
Phone: 202-305-4436  
Fax: 202-353-0461  
[robert.kiepura@usdoj.gov](mailto:robert.kiepura@usdoj.gov)  
[c-natcourts.appeals@usdoj.gov](mailto:c-natcourts.appeals@usdoj.gov)

Jacqueline C. Romero, J.D. (email)  
U.S. Attorney's Office E.D. Pa.  
615 Chestnut Street, Suite 1250  
Philadelphia, PA 19106  
Phone: (215) 861-8200  
Fax: (215) 861-8618  
[usapae.usattorney@usdoj.gov](mailto:usapae.usattorney@usdoj.gov)

Dated: July 2, 2022

Respectfully submitted,

/s/ Raj K. Patel  
T.E., T.E. Raj K. Patel (*pro se*)  
6850 East 21<sup>st</sup> Street  
Indianapolis, IN 46219  
Marion County  
317-450-6651 (cell)  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
[raj@rajpatel.live](mailto:raj@rajpatel.live)  
[www.rajpatel.live](http://www.rajpatel.live)

## EXHIBIT A

*BMA*

Bud McCorkle and Associates  
Investigative Consultant / Security Advisor  
Voice Stress Analysis / Polygraph  
1000 Main Street  
Anderson, In 46016  
765-621-0309  
e mail-marvinmccorkle@aol.com

Date: December 14, 2020

To: Brenda McGinley  
All IN Investigations  
7007 Graham Road  
Indianapolis, In. 46220

SUBJECT: RAJ K. PATEL  
Re: Digital Voice Stress Analysis (exam)  
Case #:18-1-430

Attached is the written report gained from a conversation with RAJ PATEL prior to the DVSA (Digital Voice Stress Analysis) exam conducted on December 14, 2020.

Per request, we discussed the allegations of himself being tracked via brain implant(s), verbal bashings by numerous persons both civil and in the criminal profession.

Pre and Post interview, the results Raj (1). (Feels the FBI, CIA and other Law Enforcement agencies) are stalking him (2) Unknown professionals are jealous of him, preventing him from having a great future (3) Raj said these "unusual" actions started back as early as 8 years old., but became more active sometime between 2004-2006

Note: Raj had a list for review and to formulate questions-he mentioned that he is a Democrat, however this is not his cause for this exam.

Professionally,  
Marvin "Bud" McCorkle  
President American Polygraph Voice Stress Association  
President International Society of Stress Analysts



**BMA INVESTIGATIVE CONSULTANT**

**CONFIDENTIAL TRUTH VERIFICATION REPORT**

**Date: 12.14.2020**

**ARRANGEMENTS**

On 12.14.2020 the SUBJECT-- RAJ K. PATEL \_regarding an ALL-IN Investigations case # 18-1-430 did take a DVSA examination.

We discussed the request for the Truth Verification examination, SUBJECT was interviewed and submitted to the detection of deception examination. DVSA technique was utilized.

**PURPOSE**

The SUBJECT was interviewed and examined for the purpose of determining if he is or was being truthful that he was being prohibited from advancing his career and having a future due to his own feelings of surveillance and being tracked from object in his brain.

The SUBJECT was tested by using a 15 (fifteen) question Searching exam.

**Procedure**

Standardized truth verification procedure was exercised throughout the examination. The SUBJECT acknowledged the examination was taken freely and that he was in good health, other than being nervous. All questions were reviewed with SUBJECT to protect against outside issues and to ensure that only the incident(s) in question was relevant to the examination.

**EXAM INFORMATION**

SUBJECT was examined in a private room with the examiner, the SUBJECT, RAJ PATEL was instructed to respond with "ONLY" a Yes or No and sit still.

BMA Investigations presents enclosed information to the client at his or her specific request. This material is meant for the client and his / her legal representative internal use only. BMA makes no warranty of any kind. Client will assume all risk and liability resulting from the usage of said material.

BMA--P.3 Case # 18-1-430

**CONCLUSION:**

Based on case details by the SUBJECT, upon standardized chart criteria, subject displayed a numerous amount of General Nervous Tension, along w minor Deception on two question.

General Nervous Tension is caused by many different reasons, i.e stress, repeated accusations.

Test results indicating Deception when answering Relevant questions---#4 -# 8 # 10 and #15. Questions 4 & 15 reflected—he did not want to be here.

**SUMMARY:** Raj shows he believes in his own mind that he is being tracked by numerous Govt agencies, his own father and his “cronies” and that somehow, he has or is being tracked by an “unknown” item in his head. He did say that he has tried to re-enroll back at Notre Dame in Emory and Yosnei Universities, but his psycho-therapeutic examination resulted in –one exam stating he was okay, on the second exam, they chose to deny his re enrollment. His exam does indicate, he actually feels what he is saying is true to him.

See question and answers asked:

Respectfully submitted  
Marvin "Bud" McCorkle

*Bud McCorkle*

President APAVSA  
President ISSA  
Fellow ISSA

SUBJECT TESTED-- Raj K Patel---dob 09. [REDACTED] 1992, last four of SSN-[REDACTED]

## EXHIBIT B

### ESSENTIAL ELEMENTS OF INFORMATION

(EEI)—Searching Exam

Case #: All-in Investigations---18-1-430

Name: Raj K. Patel

Type Exam    Searching    Date/Time    12/14/2020. @ 1pm

#### Questions:

- |  |     |
|--|-----|
| 1. Is your 1st name of Raj?  | YES |
| No Deception Indicated   |     |
| 2. Have you ever use any illegal drugs except Marijuana?               | NO  |
| No Deception Indicated   |     |
| 3. Have you ever lied to the FBI, CIA or any Law Enforcement agency?   | NO  |
| General Nervous Tension --No Deception Indicated                       |     |
| 4. Are you standing up?  | NO  |
| General Nervous Tension- Deception Indicated                           |     |
| 5. Do you feel you're being stressed intentionally?                    | YES |
| No Deception Indicated   |     |
| 6. Do you feel Trump could stop your stress?                           | YES |
| No Deception Indicated   |     |
| 7. Is today Monday?  | YES |
| No Deception Indicated   |     |
| 8. Do you feel an unknown source put technology in your head?          | YES |
| Deception Indicated  |     |
| 9. Do you feel the government is stressing you out ?                   | YES |
| No Deception Indicated   |     |
| 10. Are you lying to me?   | NO  |
| Deception Indicated  |     |
| 11. Are you stressed now?  | YES |
| No Deception Indicated   |     |
| 12. Do you feel Pres Trump has added to your stress?                   | YES |
| No Deception Indicated   |     |
| 13. Do you think drugs have added to your stress situation?            | NO  |
| No Deception Indicated   |     |
| 14. Do you feel your dad and his Asian cronies is causing your stress? | YES |
| No Deception Indicated   |     |

15. Have you told me the truth to all the questions asked today?

YES

Deception Indicated

.....


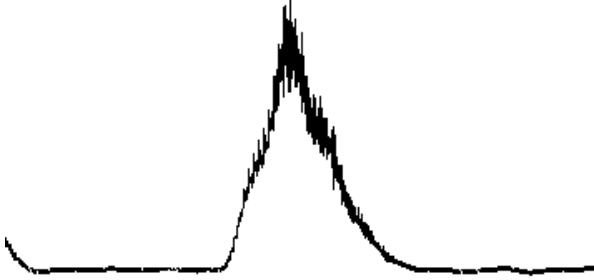
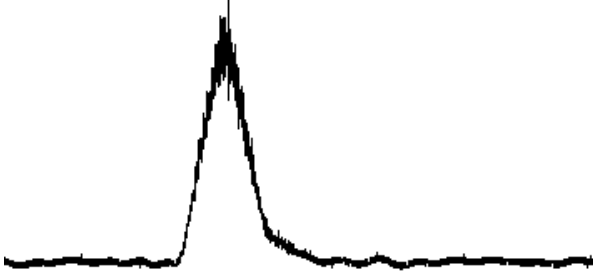
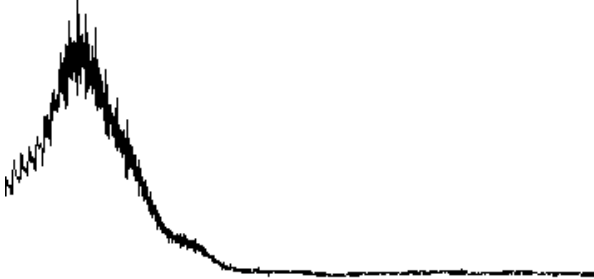
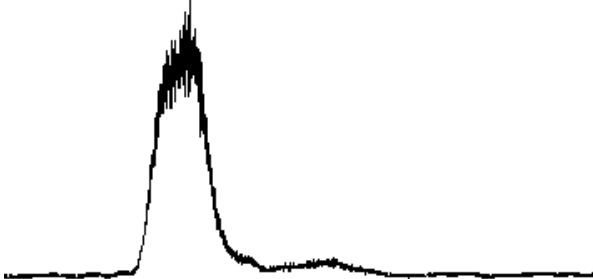
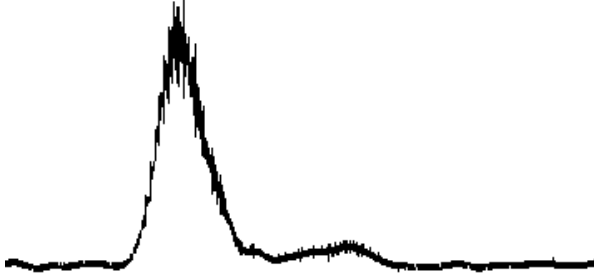
SUBJECT: RAJ K. PATEL-----DOB—09. [REDACTED] 1992, last four of SSN [REDACTED]

Examiner: *Marvin "Bud" McCorkle*, CSA #404

# EXHIBIT C

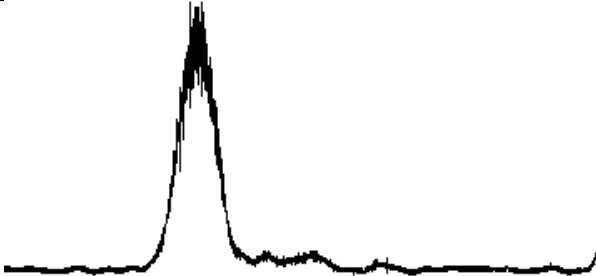
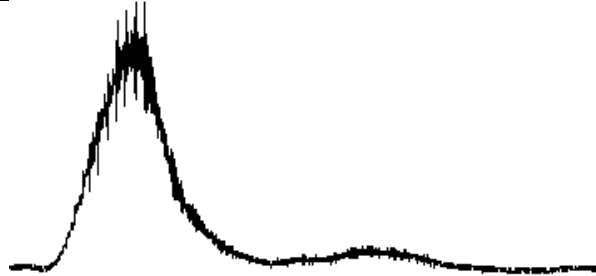
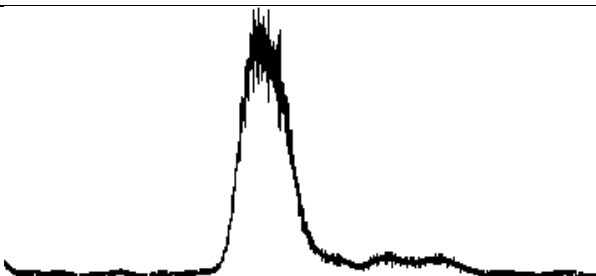
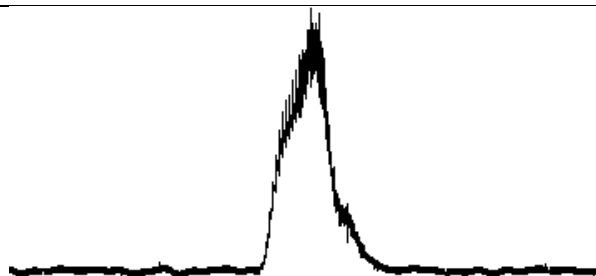
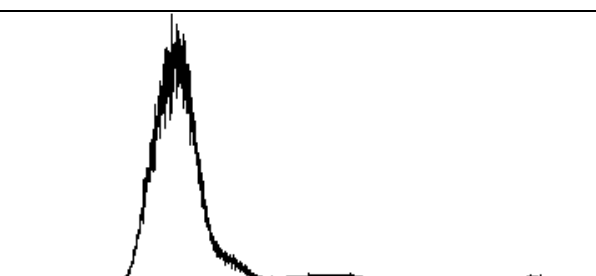
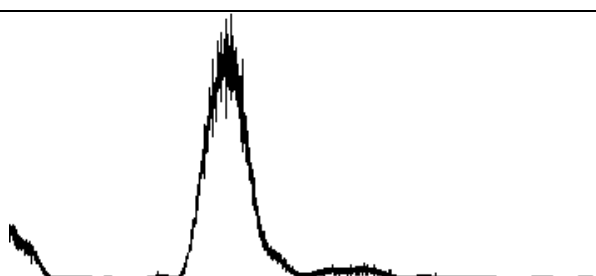
## BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM  
 Examiner Name : Bud McCorkle  
 Location : All-in  
 Examinee Name : Raj K. Patel  
 Case Type : Other  
 Charge : NA  
 Assigned ID : 75-1  
 Test Protocol : NARRATIVE

 <p>Selection Number: 1 + (YES)</p> <p>Time Begin: 3.214 End: 4.12 Total: 0.906</p> <p>Question: 1. Is your 1st name Raj?</p>	 <p>Selection Number: 2 - (NO)</p> <p>Time Begin: 6.674 End: 7.581 Total: 0.907</p> <p>Question: 2. Have you ever used any illegal drugs except Marijuana?</p>
 <p>Selection Number: 3 - (NO)</p> <p>Time Begin: 11.536 End: 12.689 Total: 1.153</p> <p>Question: 3. Have you ever lied to the FBI, CIA or any Law Enforcement agency?</p>	 <p>Selection Number: 4 - (NO)</p> <p>Time Begin: 14.585 End: 15.161 Total: 0.576</p> <p>Question: 4. Are you standing?</p>
 <p>Selection Number: 5 + (YES)</p> <p>Time Begin: 18.128 End: 19.199 Total: 1.071</p>	 <p>Selection Number: 6 + (YES)</p> <p>Time Begin: 21.918 End: 22.907 Total: 0.989</p>

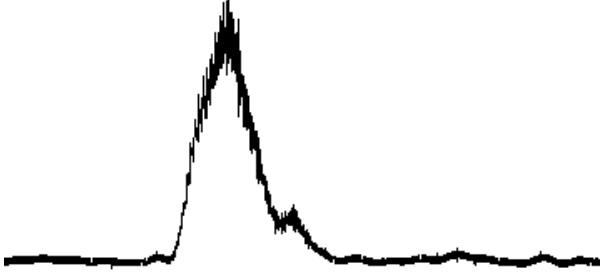
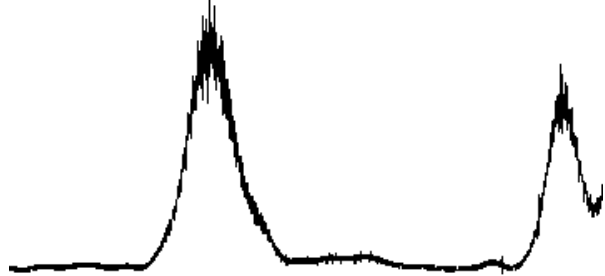
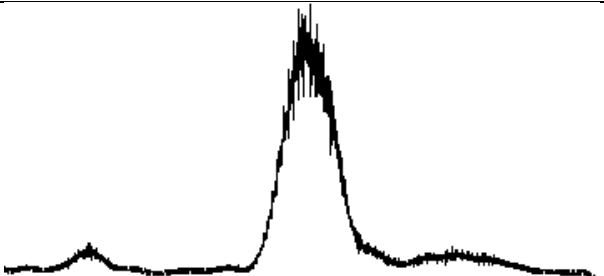
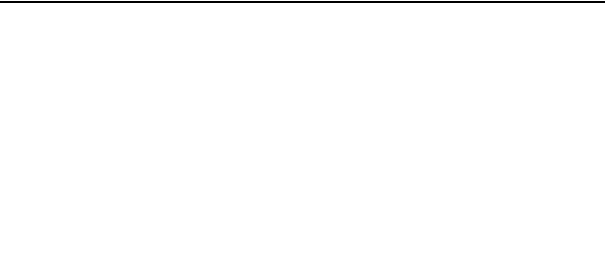

## BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM  
 Examiner Name : Bud McCorkle  
 Location : All-in  
 Examinee Name : Raj K. Patel  
 Case Type : Other  
 Charge : NA  
 Assigned ID : 75-1  
 Test Protocol : NARRATIVE

<p>Question: 5. Do you feel you are being stressed intentionally?</p>  <p>Selection Number: 7 + (YES)        Time Begin: 23.978 End: 25.379 Total: 1.401        Question: 7. Is today Monday?</p>	<p>Question: 6 Do you feel Trump could stop your stress problems?</p>  <p>Selection Number: 8 + (YES)        Time Begin: 28.428 End: 29.004 Total: 0.576        Question: 8 Do you feel an unknown source put technology in your head?</p>
 <p>Selection Number: 9 + (YES)        Time Begin: 31.394 End: 32.383 Total: 0.989        Question: 9 Do you feel the federal govt is stressing you out?</p>	 <p>Selection Number: 10 - (NO)        Time Begin: 34.196 End: 35.596 Total: 1.4        Question: 10 Are you lying to me?</p>
	

## BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM  
 Examiner Name : Bud McCorkle  
 Location : All-in  
 Examinee Name : Raj K. Patel  
 Case Type : Other  
 Charge : NA  
 Assigned ID : 75-1  
 Test Protocol : NARRATIVE

<p>Selection Number: 11 + (YES)</p> <p>Time Begin: 39.716 End: 40.623 Total: 0.907</p> <p>Question: 11. Are you stressed now?</p> 	<p>Selection Number: 12 + (YES)</p> <p>Time Begin: 43.177 End: 44.331 Total: 1.154</p> <p>Question: 12. Do you feel Pres Trump has added to your stress?</p> 
<p>Selection Number: 13 - (NO)</p> <p>Time Begin: 46.885 End: 48.039 Total: 1.154</p> <p>Question: 13. Do you think drugs has added to your stress situation?</p> 	<p>Selection Number: 14 + (YES)</p> <p>Time Begin: 51.664 End: 52.57 Total: 0.906</p> <p>Question: 14. Do you feel your dad and his Asian crownies is causing your stress?</p> 
<p>Selection Number: 15 + (YES)</p> <p>Time Begin: 54.054 End: 54.96 Total: 0.906</p> <p>Question: 15 Have you told me the truth today?</p> 	

# EXHIBIT D

## In the United States Court of Federal Claims

No. 21-2004

Filed: October 18, 2021

THE EXCELLENT THE EXCELLENT  
RAJ K. PATEL,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

### ORDER TO SHOW CAUSE

On October 7, 2021, plaintiff, proceeding *pro se*, filed a complaint with this Court, alleging, *inter alia*, that government actors breached contractual obligations and abridged his “privileges and/or immunities” by committing “battery/assault/torture/genocide/civil rights violation/conspiracy through a psycho-bio-tech stress weapon.” *See generally* Complaint, ECF No. 1. After careful review, the Court does not believe that it has jurisdiction over plaintiff’s claims.

This Court’s authority to hear cases is primarily set forth by the Tucker Act, which grants the Court of Federal Claims subject-matter jurisdiction over claims brought against the United States that are grounded on a money-mandating source of law and do not sound in tort. 28 U.S.C. § 1491(a)(1). Rule 12(h)(3) of the Rules of the Court of Federal Claims (“RCFC”) states that “[i]f the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action.”

Therefore, plaintiff is **ORDERED TO SHOW CAUSE** as to why this case should not be dismissed pursuant to RCFC 12(h)(3). In responding to this order, plaintiff must identify which source or sources of law he is invoking and explain why this Court has jurisdiction over this case. Plaintiff’s response to this order is due on or before **November 15, 2021**. Additionally, defendant’s answer is hereby **STAYED** pending the Court’s review of plaintiff’s forthcoming response.

**IT IS SO ORDERED.**

s/ *Loren A. Smith*

Loren A. Smith,  
Senior Judge



1. *Holmes v. United States*, 657 F.3d 1303, 1314 (Fed. Cir. 2011) (“[I]n a contract case, the money-mandating requirement for Tucker Act jurisdiction normally is satisfied by the presumption that money

damages are available for breach of contract, with no further inquiry being necessary.”).

2. *Cf. Holmes*, 657 F.3d at 1314 citing *Tippett v. United States*, 185 F.3d at 1254-55 (Fed. Cir. 1999) (“When a contract is not involved, to invoke jurisdiction under the Tucker Act, a plaintiff must identify a constitutional provision, a statute, or a regulation that provides a substantive right to money damages.”).

- C. To state a claim within this Court’s jurisdiction, “the plaintiff must identify a separate contract...that provides for money damages against the United States.” *Smith v. United States*, 709 F.3d 1114, 1116 (Fed. Cir. 2013) (citing *Ferreiro v. United States*, 501 F.3d 1349, 1351 (Fed. Cir. 2007)). Stated differently, the plaintiff must state a claim that is based on a provision that “can fairly be interpreted as mandating compensation by the Federal Government for the damages sustained,” *United States v. Mitchell*, 463 U.S. 206, 216-217 (1983) (citing *United States v. Testan*, 424 U.S. 392, 400 (1976)), and is “reasonably amenable to the reading that it mandates a right of recovery in damages,” *United States v. White Mountain Apache Tribe*, 537 U.S. 465, 473 (2003).
- D. “As interpreted by the United States Supreme Court, the Tucker Act waives sovereign immunity to allow jurisdiction over claims against the United States...founded on an express or implied contract with the United States...[or] seeking a refund from a prior payment made to the government.” *Vernon-Theunder: James v. United States*, No. 21-643C (Fed. Cl. Jul. 29, 2021), p. 5 citing *United States v. Navajo Nation*, 556 U.S. 287, 289-90 (2009); see also *Me.*

*Community Health Options v. United States*, 140 S. Ct. 1308, 1327-28 (2020) (citations omitted).

E. The underlying monetary claims are of three types...

1. “First, claims alleging the existence of a contract between the plaintiff and the government fall within the Tucker Act’s waiver...” *Ont. Power Generation, Inc. v. United States*, 369 F.3d 1298, 1301 (Fed. Cir. 2004) cited in *Vernon-Theunder: James v. United States*, No. 21-643C (Fed. Cl. Jul. 29, 2021), pp. 5-6.

i. At a minimum, I allege a written express contract made with the United States through President and Commander-in-Chief Trump; contractually speaking, we mildly negotiated, and I made the offer for President and Commander-in-Chief Trump to accept, which he did using American sign language and spoken English language. See Compl. at pp. 16-22 & 33-24, paras. VI, VIII, & LVI.

2. “Second, the Tucker Act’s waiver encompasses claims where ‘the plaintiff has paid money over to the Government, directly or in effect, and seeks return of all or part of that sum.’ *Eastport S.S. [Corp. v. United States]*, 178 Ct. Cl. 599, 605-06,] 372 F.2d [1002,] 1007-08 [(1967)] (describing illegal exaction claims as claims ‘in which ‘the Government has the citizen’s money in its pocket’’ (quoting *Clapp v. United States*, 127 Ct. Cl. 505, 117 F. Supp. 576, 580 (1954))...” *Ont. Power Generation, Inc.*, 369 F.3d at 1301 cited in *Vernon-Theunder: James*, No. 21-643C (Fed. Cl. Jul. 29, 2021), pp. 5-6.

- i. The facts alleges that consistent to the contractual terms Plaintiff performed his duty to live under the stress weapon and gain weight if that happens and did not interfere with the supply-chain succession. Therefore, the Plaintiff paid the Government money in effect to the government and seeks return in part.
3. “Third, the Court of Federal Claims has jurisdiction over those claims where ‘money has not been paid but the plaintiff asserts that he is nevertheless entitled to a payment from the treasury.’ *Eastport S.S.*, 372 F.2d at 1007. Claims in this third category, where no payment has been made to the government, either directly or in effect, require that the ‘particular provision of law relied upon grants the claimant, expressly or by implication, a right to be paid a certain sum.’” *Id.*; see also [*United States v. JTestan*, 424 U.S. [392,] 401-02 [(1976)]. *Ont. Power Generation, Inc.*, 369 F.3d at 1301 cited in *Vernon-Theunder: James*, No. 21-643C (Fed. Cl. Jul. 29, 2021), pp. 5-6.
  - i. Particular source of the law would be the alleged contract between Plaintiff and the Defendant-United States. *Holmes v. United States*, 657 F.3d 1303, 1314 (Fed. Cir. 2011) (“[I]n a contract case, the money-mandating requirement for Tucker Act jurisdiction normally is satisfied by the presumption that money damages are available for breach of contract, with no further inquiry being necessary.”).

F. To conduct that analysis, we apply the traditional four-part test for the existence of a government contract: (1) mutuality of intent to contract; (2) offer and acceptance; (3) consideration; and (4) a government representative having actual authority to bind the United States. *Hometown Fin., Inc. v. United States*, 409 F.3d 1360, 1364 (Fed. Cir. 2005) cited in *Columbus Reg'l Hosp. v. United States* 990 F.3d 1330, 1339 (Fed. Cir. 2021).

1. Mutuality of intent to contract – At a minimum, President Trump and I showed mutuality of intent to enter and continue the contract, after I sent him a written description of the contract. I also asked him to display the sign to make sure he would be enforce the contract, which is his constitutional power. Compl. p. 45-46.
2. Offer and acceptance – *Balt. Ohio R.R. v. United States* 261 U.S. 592, 598 (1923) (Such an agreement will not be implied unless the meeting of minds was indicated by some intelligible conduct, act or sign. *Woods v. Ayres*, 39 Mich. 345, 351).
  - i. The United States made the offer for me to live under the stress weapon, as they observe as “bodyguards” and observers,” until the stress weapon is terminated. Compl. p. 45-46. Or, I made the counter offer, which President Trump accepted immediately.
  - ii. President Trump uses American sign language to accept the written offer or re-enforce the contract. *See* Compl. 36-37, para. LVI.
3. Consideration –

- i. The United States would get to learn about how the stress weapon works, as used on me by the terrorists on its target and field, and the goals of the stress weapon, which is also knowledge that they can use to improve the lives of others by terminating the stress weapon or giving them damages too in a separate case.
- ii. The United States would get to get more certainty to faithfully execute the laws and constitution of the United States and protect my safety over the terrorists.
- iii. The United States would get improve the lives of others in the human capital and student supply chain and would be able to faithfully give me money for the service I have given it.
- iv. I would get justice in forms of money for the damages, the stress weapon would be countered to ensure that my college academics are not hindered, and I would get money for my service, including living under the stress weapon, seeing who uses its and possibly criminal action against them, and money, including for the damages which had already accrued before the first offer and acceptance. *See* Compl. at p. 45-46; *Id.* at 16-22, paras. VI & VIII. The breach happened when I would have excessive skin due to weight gain and will require skin amputation and permanent scarring.
- v. The United States would get certainty that only what is owed to me would be paid, rather than more or less, and constitutional and

political victory over a terroristic power operating within the United States.

4. A government representative having actual authority to bind the United States –
  - i. At a minimum, President Trump has actual authority to bind the United States to the contract.

### G. Relief:

1. Order damages or liquidated damages as below.
2. In the alternative, order specific performance of the contract, except required the United States to allow for weight loss and stop further fat mass weight gain, and have them pay the money on my 30<sup>th</sup> birthday.
3. The court's inherent authority can be used.

II. “The United States Court of Federal Claims shall have jurisdiction to render judgment upon any claim against the United States...for liquidated or unliquidated damages in cases not sounding in tort.” 28 U.S.C. § 1491(a)(1).

A. *Holmes*, 657 F.3d at 1314 (“[I]n a contract case, the money-mandating requirement for Tucker Act jurisdiction normally is satisfied by the presumption that money damages are available for breach of contract, with no further inquiry being necessary.”).

1. The terms of the contracts are formulaic to also serve as liquidated damages (i.e. \$1 per American for being under the stress weapon before the classmate in paragraph VI made the offer, which was ratified and accepted (or as I offered to President Trump and accepted by President

Trump using American sign language)) and the money would be received for the accrued harm from the terroristic stress weapon stressor (i.e. loss of opportunity) and for services rendered under the stress weapon. *See* Compl. at p. 45-46; *Id.* at 16-22, paras. VI & VIII.

III. “The United States Court of Federal Claims shall have jurisdiction to render judgment upon any claim against the United States founded either upon the Constitution...or any Act of Congress.” 28 U.S.C. § 1491(a)(1).

A. “As interpreted by the United States Supreme Court, the Tucker Act waives sovereign immunity to allow jurisdiction over claims against the United States...based on federal constitutional, statutory, or regulatory law mandating compensation by the federal government for damages sustained.” *Vernon-Theunder: James v. United States*, No. 21-643C (Fed. Cl. Jul. 29, 2021), p. 5 citing *United States v. Navajo Nation*, 556 U.S. 287, 289-90 (2009); *see also Me. Community Health Options v. United States*, 140 S. Ct. 1308, 1327-28 (2020) (citations omitted).

B. To state a claim within this Court’s jurisdiction, “the plaintiff must identify a...statute...that provides for money damages against the United States.” *Smith v. United States*, 709 F.3d 1114, 1116 (Fed. Cir. 2013) (*citing Ferreiro v. United States*, 501 F.3d 1349, 1351 (Fed. Cir. 2007)). Stated differently, the plaintiff must state a claim that is based on a provision that “can fairly be interpreted as mandating compensation by the Federal Government for the damages sustained,” *United States v. Mitchell*, 463 U.S. 206, 216-217 (1983) (*citing United States v. Testan*, 424 U.S. 392, 400 (1976)), and is “reasonably amenable to the reading



that it mandates a right of recovery in damages,” *United States v. White Mountain Apache Tribe*, 537 U.S. 465, 473 (2003).

C. Separate from the contract and if there is no contract, my Free Exercise of Religion has been sustainably burdened by living under the constant use of the stress weapon and for in interfering on the right-side of my brain which functions the religious brain-power or brain-processing and my religious acts, such as civic expression and social expression. The government of substantially burdened my Free Exercise of Religion by not terminating the terroristic stress weapon (omission of Constitutional duty).

1. 42 U.S.C. § 2000bb-1(c).

2. 42 U.S. Code § 2000bb(a)(1) & (3)

i. § 2000bb(a)(1) - The constitutional duty for the government to protect the Free Exercise of Religion is found in Section 1 of Article VI of the United States Constitution which refers to all the following: the Declaration of Independence (1776) (i.e. Humans are “endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.--That to secure these rights, Governments are instituted among Men, deriving their just powers from the consent of the governed.”), the Treaty of Paris (1783), and the Congressional Proclamation in Support of the Treaty of Paris (Jan. 1784). *Cf.* U.S. const., amend.

I.

ii. § 2000bb(a)(3) - The government had no compelling justification not to perform its duty to protect my constitutional rights under Section 1 of Article VI of the United States Constitution, over the course of 21 years or more.

3. The court's inherent authority can be used.

IV. Full Faith and Credit Clause: “Full Faith and Credit shall be given in each State to the public Acts...And the Congress may by general Laws prescribe the Manner in which such Acts, Records and Proceedings shall be proved, and the Effect thereof.” U.S. const., art. IV, § 1.

A. Full Faith requires The United States to ensure that I am free from the stress weapon and restored to dignity of my style/title as The Excellent Student Body President of B.C.S.C. and also The Excellent Student Body President of Emory University, Inc. Full Faith and Credit limits the use of force of those who are styled by any sovereign within the Union.

### B. Relief:

1. See Paris Peace Treaty – Congressional Proclamation of Jan. 14, 1784 (every judge should uphold the Treaty of Paris “sincerely, strictly, and completely”) referred in Section 1 of Article VI of the United States Constitution.

2. *See also Id.* for Federalism.

3. The court's inherent authority can be used.

V. Privileges and Immunities Clause: “The citizens of each state shall be entitled to all privileges and immunities of citizens in the several states.” (includes state- and federal-

A. If a person is styled in a political subdivision, through elected office, and that person is a United States Citizen, the United States must not deny the rights, privileges, and immunities bestowed upon him/her/they enshrined in the constitutional and national documents, including corporate law and charters. I am a natural-born American citizen, and I have the privilege of holding two political subdivision offices, one at B.C.S.C. and another one at Emory University, Inc. In both political subdivisions, I was the head of the student government, an institution which predates the signing of the United States Constitution. [For example, a not-United States citizen who is elected to a political subdivision which is a local municipal corporation may be denied the privileges of executive privilege by the State and/or the United States. In addition, a not-United States elected to a political subdivision may be denied the immunities of that political subdivision which would otherwise be given to United States citizens.].

### B. Relief:

1. The President of the United States and other executive officers are responsible for ensuring that the Constitution is enforced, including the Privileges and Immunities.
2. *See* Paris Peace Treaty – Congressional Proclamation of Jan. 14, 1784 (every judge should uphold the Treaty of Paris “sincerely, strictly, and completely”) referred in Section 1 of Article VI of the United States Constitution.

3. *See also Id.* for Federalism.

4. The court's inherent authority can be used.

VI. Privileges or Immunities Clause: "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States..." (includes state- and federal- created corporations, see Grievance 21, Decl. of Independence (1776) and U.S. const., art. VI, § 1).

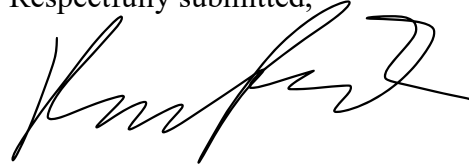
A. *See supra*, paragraph V(A).

B. Relief: *See supra*, paragraph V(B).

C. The court's inherent authority can be used.

*See* RCFC 8(d)(1)-(3).

Respectfully submitted,



T.E., T.E. Raj K. Patel  
1239 Spring Lake Drive  
Brownsburg, IN 46112  
Hendricks County  
317-450-6651 (cell)  
[raj2010@gmail.com](mailto:raj2010@gmail.com)  
[www.rajpatel.live](http://www.rajpatel.live)

*Pro Se*

J.D. Candidate, Notre Dame L. Sch. 2022  
(or permanently withdrew)  
President/Student Body President, Student  
Gov't Ass'n of Emory U., Inc. 2013-  
2014 (corporate sovereign 2013-present)  
Student Body President, Brownsburg Cmty.  
Sch. Corp./President, Brownsburg High  
Sch. Student Gov't 2009-2010  
(corporate sovereign 2009-present)

Rep. from the Notre Dame L. Sch. Student  
B. Ass'n to the Ind. St. B. Ass'n 2017  
Deputy Regional Director, Young  
Democrats of Am.-High Sch. Caucus  
2008-2009  
Co-Founder & Vice Chair, Ind. High Sch.  
Democrats 2009-2010  
Vice President of Fin. (Indep.), Oxford C.  
Republicans of Emory U., Inc. 2011-  
2012

# EXHIBIT F

## In the United States Court of Federal Claims

No. 21-2004

Filed: November 5, 2021

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THE EXCELLENT THE EXCELLENT  
RAJ K. PATEL,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

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### ORDER

Plaintiff Raj K. Patel, proceeding *pro se*, filed a complaint with this Court alleging, *inter alia*, that the government breached its contractual obligations, violated his right to free exercise of religion, and abridged his “privileges and/or immunities” by committing “battery/assault/torture/genocide/civil rights violation/conspiracy through a psycho-bio-tech stress weapon.” Complaint at 1–3, ECF No. 1 [hereinafter Compl.]. The Court ordered plaintiff to show cause as to why this Court has jurisdiction over his claims. *See* Show Cause Order, ECF No. 7. Plaintiff responded to the Court’s Order the next day. *See* Plaintiff’s Response to Show Cause Order, ECF No. 9 [hereinafter Pl.’s Resp.]. After careful review of plaintiff’s Complaint and Response to the Court’s Show Cause Order, the Court determines it does not have jurisdiction and therefore must dismiss the Complaint. *See* R. Ct. Fed. Cl. 12(h)(3).

Plaintiff brings his claims under the Tucker Act, 28 U.S.C. § 1491. Compl. at 5. The Tucker Act grants the Court of Federal Claims subject-matter jurisdiction over claims brought against the United States that are grounded on a money-mandating source of law and do not sound in tort. 28 U.S.C. § 1491(a)(1). This includes claims against the United States for breach of contract. *Higbie v. United States*, 778 F.3d 990, 993 (Fed. Cir. 2015). The jurisdictional grant is limited, however, *see United States v. Testan*, 424 U.S. 392, 398 (1976), and if the Court “determines at any time that it lacks subject-matter jurisdiction,” it must dismiss the action. R. Ct. Fed. Cl. 12(h)(3).

Plaintiff has the burden of demonstrating that this Court has jurisdiction over his claims. *See Reynolds v. Army & Air Force Exchange Serv.*, 846 F.2d 746, 748 (Fed. Cir. 1988). And while *pro se* plaintiffs are given “leeway on procedural matters, such as pleading requirements,” *McZeal v. Sprint Nextel Corp.*, 501 F.3d 1354, 1356 (Fed. Cir. 2007), this leniency does not lessen the plaintiff’s jurisdictional burden. *See Ibrahim v. United States*, 799 Fed. Appx. 865, 867 (Fed. Cir. 2020) (citing *Kelley v. Sec’y, United States Dep’t of Labor*, 812 F.2d 1378, 1380 (Fed. Cir. 1987)).

Demonstrating this Court’s jurisdiction is generally a low bar. *See, e.g., Columbus Reg’l Hosp. v. United States*, 990 F.3d 1330, 1341 (Fed. Cir. 2021) (“As a general rule, if a plaintiff alleges breach of a contract with the government, the allegation itself confers power on the Claims Court to decide whether the claim has merit.”). Claims that are “factually frivolous,” however, fall outside of this Court’s jurisdiction. *See, e.g., Spencer v. United States*, 98 Fed. Cl. 349, 356 (2011). These are claims supported by facts that are “delusional,” “clearly baseless,” or “rise to the level of the irrational or the wholly incredible.” *Id.* Determining whether a claim is factually frivolous is within this Court’s discretion. *See id.* (citing *Denton v. Hernandez*, 504 U.S. 25, 33 (1992)).

Upon *sua sponte* review, the Court finds that plaintiff fails to plead a non-frivolous claim for relief. *See Spencer*, 98 Fed. Cl. at 356. The allegations asserted in plaintiff’s Complaint, including the claims regarding his alleged contract with the government over use of “a psycho-bio-tech stress weapon,” fall into the category of “delusional” or “clearly baseless.” *Id.* In other words, plaintiff’s claims are frivolous. Therefore, this Court does not have jurisdiction over plaintiff’s claims and must dismiss the Complaint.

Accordingly, plaintiff’s Complaint is **DISMISSED**, *sua sponte*, pursuant to Rule 12(h)(3) of the Rules of the United States Court of Federal Claims. The Clerk of Court is hereby directed to take the necessary steps to dismiss this matter.

**IT IS SO ORDERED.**

s/ *Loren A. Smith*  
Loren A. Smith,  
Senior Judge

Mr. Patel brought this suit seeking \$3,760,000,000 for breach of a contract with the President of the United States “about living under the stress weapon.” Appx47. Mr. Patel further alleged that the government failed to protect his



right of the free exercise of religion, violated his right to privacy, violated the equal protection clause, violated the Takings Clause by taking his “word patterns,” and was part of a criminal conspiracy against him. Appx57. The Court of Federal Claims dismissed, and he now appeals.

We agree with the government that the merits of the parties’ positions as stated in the opening brief and motions papers are so clear as to warrant summary affirmance. *See Joshua v. United States*, 17 F.3d 378, 380 (Fed. Cir. 1994). The Tucker Act, 28 U.S.C. § 1491, limits the Court of Federal Claims’ jurisdiction to claims for money damages against the United States based on sources of substantive law that “can fairly be interpreted as mandating compensation by the Federal Government.” *United States v. Navajo Nation*, 556 U.S. 287, 290 (2009) (citation and internal quotation marks omitted). The Court of Federal Claims correctly concluded that Mr. Patel’s allegations were baseless and that it lacked jurisdiction over any of his claims.

Accordingly,

IT IS ORDERED THAT:

- (1) The motion is granted. The Court of Federal Claims’ judgment is summarily affirmed.
- (2) All other pending motions are denied as moot.
- (3) Each side shall bear its own costs.

FOR THE COURT

February 11, 2022  
Date

/s/ Peter R. Marksteiner  
Peter R. Marksteiner  
Clerk of Court

## APPENDIX A

# 'Havana Syndrome' symptoms in small group most likely caused by directed energy, says U.S. intel panel of experts

Injuries suffered by several dozen diplomats and spies were consistent with directed energy, the panel said. About 1,000 people have reported symptoms.

Feb. 2, 2022, 2:00 PM EST / Updated Feb. 2, 2022, 9:17 PM EST

The mysterious and sudden brain injuries suffered by a small group of American diplomats and spies overseas were most likely caused by pulsed electromagnetic energy delivered by an external device, a panel of scientific experts working for U.S. intelligence agencies has concluded.

The panel's findings, while full of caveats, are consistent with what has been a longstanding hypothesis by intelligence officials — that a foreign adversary, most likely Russia, is responsible for at least some of the symptoms suffered by those who have fallen victim to what is commonly known as Havana Syndrome.

The panel's conclusions also are consistent with a [recent CIA interim assessment](#), which found that most of the 1,000 people who have come forward with possible injuries have symptoms that can be explained by other factors.

The CIA assessment, issued last month, also ruled out what it called a sustained global campaign by a hostile foreign power to injure Americans. But it found two dozen cases in which it could not rule out a hostile cause, and those appear to be the cases the expert panel focused on.

Many of those people are part of [the original group of diplomats and spies who first exhibited symptoms](#) in 2016 at [the U.S. Embassy in Havana](#). Intelligence officials declined to say whether any recent cases are part of the cohort of unexplained symptoms, or whether they believe Americans abroad continue to be at risk.

Intelligence officials familiar with the panel's work told NBC News that it did not consider the question of who might be to blame for the injuries — only what the medical and technical evidence said about possible causes. Russia has denied any link to Havana Syndrome symptoms.



The panel's scientific conclusions are likely to put a new spotlight on

the theory that at least some Americans serving overseas were injured by an external force, a notion that many perceived the CIA assessment as having dispelled. A number of U.S. diplomats and spies who had reported suspected incidents had expressed dismay over the CIA's report, which was widely perceived publicly as throwing cold water on the belief that Americans had been attacked.

The panel's findings expanded on a 2020 report by the National Academies of Sciences, Engineering, and Medicine, which also found that pulsed electromagnetic energy, also referred to as microwave energy, was the most plausible culprit. That report noted that Russia has a long history of studying and developing the technology.

Intelligence officials told NBC News that the panel included a group of scientists and technical experts from both inside and outside the government who reviewed more than a thousand classified documents and conducted the most exhaustive study to date on the possible causes of Havana Syndrome.

The panel focused on cases in which victims reported hearing a sound from a particular direction or feeling pressure in one ear, and who then suffered vertigo. They also sought to exclude any possible medical or environmental factors.

The panel found that "pulsed electro magnetic energy plausibly explains" the core cases, "although information gaps exist."

The panel did not identify any device capable of inflicting the injuries.

"It's more than theory — we were able to obtain some level of evidence," one officials said. "But there are some significant information gaps."



Officials said the experts also could not rule out high-powered ultrasound beams as a possible cause, but concluded that microwave energy was more likely to have been easily concealed, low powered and able to penetrate walls.



That conclusion was notable, because some Havana Syndrome victims reported feeling the sensation of being hit by an invisible blast or pressure wave while inside their apartments or homes. Some experts have questioned whether any microwave device that could cause such symptoms from a distance could have a portable power source — one suggested the power source would have to be the size of a small car. But the panel of experts concluded the power requirements would not be high.

Also notable was the panel's conclusion that they could not attribute the core symptoms of what they call "Anomalous Health Incidents," or AHIs, to any known medical condition — or to some sort of

psychological syndrome.

"Although some signs and symptoms of AHIs are common in known medical conditions, the combination of the four core characteristics is distinctly unusual and unreported elsewhere in the medical literature, and so far have not been associated with a specific neurological abnormality," the panel concluded in an executive summary.

It added: "No known psychosocial factors explain the core characteristics, and the incidents exhibiting these characteristics do not fit the majority of criteria used to discern mass sociogenic illness."

The panel did find that some of the symptoms experienced by intelligence operatives and diplomats "could be due to hypervigilance and normal human reactions to stress and ambiguity, particularly among a workforce attuned to its surroundings and trained to think about security."

However, it added, "the signs and symptoms of AHIs are genuine and compelling."

Some incidents affected a number of people in the same space, and some victims were found to have suffered "cellular injury to the nervous system."

Officials said the panel interviewed researchers who worked around commercial microwave devices — and ultrasound devices — who described suffering similar symptoms in accidental exposures.

Havana Syndrome is believed to have emerged in late 2016, when U.S. diplomats and spies serving in Cuba began reporting bizarre sounds and sensations followed by unexplained illnesses and symptoms,

including hearing and vision loss, memory and balance problems, headaches and nausea.



Over the years, many hundreds of U.S. officials have come forward reporting suspected incidents in more than a dozen countries, NBC News has reported.

NBC News reported in 2018 that U.S. intelligence officials [considered Russia a leading suspect](#) in what some of them assessed to have been deliberate attacks on diplomats and CIA officers overseas. But in the three years since then, the spy agencies have not uncovered enough evidence to pinpoint the cause or the culprit of the health incidents.

Going forward, the panel recommends that intelligence agencies try to identify "biomarkers"— changes in blood or tissue or brain function — that are associated with the health incidents, to better identify them if they happen again.

The panel also recommended that agencies collect more data on the possible incidents and “develop a coordinated communications strategy to inform and educate the U.S. Government workforce,” about the phenomenon.

In a statement, a group of people who believe they are victims of Havana Syndrome said the panel’s findings reinforce “the need for the intelligence community and the broader U.S. government to redouble their efforts to fully understand the causes.”

They also welcomed the Biden administration’s recent [announcement](#) of a top White House official to serve as “AHI Interagency Coordinator.”

“This appointment is a welcome expression of concern and support by the president and his team,” the statement said.

In a statement accompanying a public summary of the panel’s work, Avril Haines, the director of national intelligence, and William Burns, the CIA director, said it will “help sharpen the work of the IC and broader U.S. Government as we focus on possible causes. We will stay at it, with continued rigor, for however long it takes.”

Dr. Eric Lander, the Biden administration’s director of the White House Office of Science and Technology Policy, said in a statement that the government had convened panels in the past to examine the potential causes of the syndrome, “but this is the first time a panel has had such wide-ranging access to intelligence reporting and patient data, and has engaged directly with affected individuals. The panelists spent almost nine months undertaking this study ... Their meticulous approach provides a roadmap for important work we still need to undertake.”

Also Wednesday, a separate report by the JASON advisory group, a



collection of outside experts that advises the government through the Mitre Corp., issued its own assessment of Havana Syndrome, finding that "it is not possible to conclude at this time that the events....are the result of intentional attacks that cause physical harm. However, it is not possible, either, to rule out mechanisms that do not cause any physical harm but which might constitute harassment and lead to health conditions and functional disorders, for example through unpleasant sounds or pressure sensations."

The report added, "Given this, and in the interest of protecting embassy personnel and their families, it would be prudent to be vigilant against tactics intended to produce anxiety and trauma, with an intent to either disrupt operations and/or cause long-term harm. The U.S. government could minimize the effects of such tactics, if present, through open communication, education, and appropriate rapid medical response to any conditions that develop."

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## APPENDIX B

### RAJ PATEL'S DECLARATION

I, Raj K. Patel, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the plaintiff who has filed this complaint in the District Court for the District of Columbia.
2. While a candidate for the juris doctor degree at the University of Notre Dame Law School, from August 2015 to November 2017, I completed 68 credit hours, including 4 credit hours in the legal course of contracts, 4 credit hours in the legal course of constitutional law, and 4 credit hours in the legal course of civil procedure. 68 credit hours is also the minimum number of credit hours required by the American Bar Association for a law school to certify a degree of juris doctor.
3. I have passed all psychiatric exams and brain exams and do not suffer from a mental disorder, including but not limited to delusions, and I have been recommended for re-admissions into the University of Notre Dame Law School under its mandatory psychiatric exam for students seeking re-admissions.
4. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

#### *Privileges and/or Immunities Clause Claims*

5. In or around April 2009, I became the Student Body President of the Brownsburg Community School Corporation and President of the Student Government of Brownsburg High School.
6. In April 2013, I became the Student Body President of Emory University, Inc. and the President of the Emory University Student Government Association.

7. It is my professional opinion that the United States Constitution gives me privileges and immunities against the stress weapon as a natural-born American citizen.
8. It is my professional opinion that the United States Constitution gives me these privileges and immunities not only during an incumbency of these aforementioned student political offices but also are held thenceforth and after the completion of each term.
9. The United States District Courts has sufficient jurisdiction over the privileges and immunities claims under Full Faith and Credit Clause and Section 1 of Article VI of the United States Constitution referring to the Congressional Proclamation (1784) in Support of the Treaty of Paris (1783).

***Full Faith and Credit Claims***

10. I incorporate paragraphs 5 to 9.
11. It is my professional opinion that the United States Constitution requires the United States to deflect the stress weapon, as the United States must give my privileges and/or immunities from political office Full Faith.
12. Independently from paragraph 11, the United States must give my “public Act” of attaining political offices Full Faith and Credit. Therefore, the United States must deflect the stress weapon, which has hindered not only my academic career but also political and professional careers.
13. It is my professional opinion that either Section 1 of Article II of the United States Constitution or Section 1 of Article III of the United States Constitution would allow the a District Court to order the executive power of the United States to

deflect the stress weapon. *See also* U.S. const. art. VI, § 1 referring to Congressional Proclamation (1784) in Support of the Treaty of Paris (1783).

14. The same constitutional articles mentioned in paragraph 13 allow the District Court to authorize compensation and other corrective actions for violations of the Full Faith and Credit Clause.
15. The Full Faith and Credit Clause also requires me to uphold the United States Constitution and other duties given me to by my “public Act.”
16. The United States District Courts have sufficient jurisdiction over these Full Faith and Credit and Privilege and Immunities Clause violations under the Full Faith and Credit Clause and Section 1 of Article VI of the United States Constitution referring to the Congressional Proclamation (1784) in Support of the Treaty of Paris (1783). *See also* U.S. const., art. I, § 1 & art. II, § 3.

### ***Declaration***

17. In addition to serve as my professional opinions buttressed by my legal course credit hours, I declare paragraphs 1 to 29 to serve as my political opinions.
18. In addition to serve as my professional opinions buttressed by my undergraduate diploma of Bachelor of Arts in Political Science and with Honors in Religion, which gives me constitutional rights, honors, and Privileges, I declare paragraphs 1 to 18 to serve as my political opinions too.
19. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on the 27th day of June 2022.

Respectfully submitted,

T.E., T.E. Raj K. Patel  
6850 East 21<sup>st</sup> Street  
Indianapolis, IN 46219  
317-450-6651 (cell)  
[raj2010@gmail.com](mailto:raj2010@gmail.com)  
[www.rajpatel.live](http://www.rajpatel.live)

*Pro Se*

J.D. Candidate, Notre Dame L. Sch.  
President/Student Body President, Student Gov't  
Ass'n of Emory U., Inc. 2013-2014 (corporate  
sovereign 2013-present)  
Student Body President, Brownsburg Cmty. Sch.  
Corp./President, Brownsburg High Sch.  
Student Gov't 2009-2010 (corporate sovereign 2009-  
present)  
Rep. from the Notre Dame L. Sch. Student B. Ass'n to  
the Ind. St. B. Ass'n 2017  
Deputy Regional Director, Young Democrats of Am.-  
High Sch. Caucus 2008-2009  
Co-Founder & Vice Chair, Ind. High Sch. Democrats  
2009-2010  
Communications Team, Rahim for HSDEMS 2009  
(victory)  
Vice President of Fin. (Indep.), Oxford C. Republicans  
of Emory U., Inc. 2011-2012

## APPENDIX C

### BRIEFING ROOM

# Executive Order on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals

JUNE 15, 2022 • PRESIDENTIAL ACTIONS

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1. Policy. Our Nation has made great strides in fulfilling the fundamental promises of freedom and equality for lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI+) Americans, owing to the leadership of generations of LGBTQI+ individuals. In spite of this historic progress, LGBTQI+ individuals and families still face systemic discrimination and barriers to full participation in our Nation's economic and civic life. These disparities and barriers can be the greatest for transgender people and LGBTQI+ people of color. Today, unrelenting political and legislative attacks at the State level — on LGBTQI+ children and families in particular — threaten the civil rights gains of the last half century and put LGBTQI+ people at risk. These attacks defy our American values of liberty and dignity, corrode our democracy, and threaten basic personal safety. They echo the criminalization that LGBTQI+ people continue to face in some 70 countries around the world. The Federal Government must defend the rights and safety of LGBTQI+ individuals.

It is therefore the policy of my Administration to combat unlawful discrimination and eliminate disparities that harm LGBTQI+ individuals and their families, defend their rights and safety, and pursue a comprehensive approach to delivering the full promise of equality for LGBTQI+ individuals, consistent with Executive Order 13988 of January 20, 2021 (Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation).

The Federal Government must take action to address the significant disparities that LGBTQI+ youth face in the foster care system, the misuse of State and local child welfare agencies to target LGBTQI+ youth and families, and the mental health needs of LGBTQI+ youth. My Administration must safeguard LGBTQI+ youth from dangerous practices like so-called “conversion therapy” — efforts to suppress or change an individual's sexual orientation, gender identity, or gender expression — a discredited practice that research indicates can cause significant harm, including higher rates of suicide-related thoughts and behaviors by LGBTQI+



youth. The Federal Government must strengthen the supports for LGBTQI+ students in our Nation's schools and other education and training programs. It must also address the discrimination and barriers that LGBTQI+ individuals and families face by expanding access to comprehensive health care, including reproductive health; protecting the rights of LGBTQI+ older adults; and preventing and addressing LGBTQI+ homelessness and housing instability. Through these actions, the Federal Government will help ensure that every person – regardless of who they are or whom they love – has the opportunity to live freely and with dignity.

Sec. 2. Addressing Harmful and Discriminatory Legislative Attacks on LGBTQI+ Children, Youth, and Families. (a) **The Secretary of Health and Human Services (HHS) shall**, as appropriate and consistent with applicable law, use the Department of HHS's authorities to protect LGBTQI+ individuals' access to medically necessary care from harmful State and local laws and practices, and shall promote the adoption of promising policies and practices to support health equity, including in the area of mental health care, for LGBTQI+ youth and adults. Within 200 days of the date of this order, the Secretary of HHS shall develop and release sample policies for States to safeguard and expand access to health care for LGBTQI+ individuals and their families, including mental health services.

(b) The Secretary of Education shall, as appropriate and consistent with applicable law, use the Department of Education's authorities to support LGBTQI+ students, their families, educators, and other school personnel targeted by harmful State and local laws and practices, and shall promote the adoption of promising policies and practices to support the safety, well-being, and rights of LGBTQI+ students. Within 200 days of the date of this order, the Secretary of Education shall develop and release sample policies for supporting LGBTQI+ students' well-being and academic success in schools and educational institutions.

### Sec. 3. Addressing Exposure to So-Called Conversion Therapy.

(a) The **Secretary of HHS** shall establish an initiative to reduce the risk of youth exposure to so-called conversion therapy. As part of that initiative, the Secretary of HHS shall, as appropriate and consistent with applicable law:

(i) consider whether to issue guidance clarifying for HHS programs and services agencies that so-called conversion therapy does not meet criteria for use in federally funded health and human services programs;



- (ii) increase public awareness of the harms and risks associated with so-called conversion therapy for LGBTQI+ youth and their families;
  - (iii) increase the availability of technical assistance and training to health care and social service providers on evidence-informed promising practices for supporting the health, including mental health, of LGBTQI+ youth, and on the dangers of so-called conversion therapy; and
  - (iv) seek funding opportunities for providers of evidence-based trauma-informed services to better support survivors of so-called conversion therapy.
- (b) The Federal Trade Commission is encouraged to consider whether so-called conversion therapy constitutes an unfair or deceptive act or practice, and to issue such consumer warnings or notices as may be appropriate.
- (c) To address so-called conversion therapy around the world, within 180 days of the date of this order, the Secretary of State, in collaboration with the Secretary of the Treasury, the Secretary of HHS, and the Administrator of the United States Agency for International Development, shall develop an action plan to promote an end to its use around the world. In developing the action plan, the Secretary of State shall consider the use of United States foreign assistance programs and the United States voice and vote in multilateral development banks and international development institutions of which the United States is a shareholder or donor to take appropriate steps to prevent the use of so-called conversion therapy, as well as to help ensure that United States foreign assistance programs do not use foreign assistance funds for so-called conversion therapy. To further critical data collection, the Secretary of State shall instruct all United States Embassies and Missions worldwide to submit additional information on the practice and incidence of so-called conversion therapy as part of the Country Reports on Human Rights Practices.

Sec. 4. Promoting Family Counseling and Support of LGBTQI+ Youth as a Public Health Priority of the United States. (a) “Family counseling and support programs” are defined for the purposes of this order as voluntary programs in which families and service providers may elect to participate that seek to prevent or reduce behaviors associated with family rejection of LGBTQI+ youth by providing developmentally appropriate support, counseling, or information to parents, families, caregivers, child welfare and school personnel, or health care professionals on how to support an LGBTQI+ youth’s safety and well-being.



(b) The Secretary of HHS shall seek to expand the availability of family counseling and support programs in federally funded health, human services, and child welfare programs by:

- (i) considering whether to issue guidance regarding the extent to which Federal funding under Title IV-B and IV-E of the Social Security Act, 42 U.S.C. Ch. 7, may be used to provide family counseling and support programs;
- (ii) considering funding opportunities for programs that implement family counseling and support models;
- (iii) considering opportunities through the Centers for Disease Control and Prevention (CDC) and the National Institutes of Health to increase Federal research into the impacts of family rejection and family support on the mental health and long-term well-being of LGBTQI+ individuals; and
- (iv) ensuring that HHS data, investments, resources, and partnerships related to the CDC Adverse Childhood Experiences program address the disparities faced by LGBTQI+ children and youth.

Sec. 5. Addressing Discrimination and Barriers Faced by LGBTQI+ Children, Youth, Parents, Caretakers, and Families in the Child Welfare System and Juvenile Justice Systems. (a) The Secretary of HHS shall consider how to use the Department's authorities to strengthen non-discrimination protections on the basis of sex, including sexual orientation, gender identity, and sex characteristics, in its programs and services, consistent with Executive Order 13988 and applicable legal requirements.

(b) The Secretary of HHS shall direct the Assistant Secretary for Family Support to establish an initiative to partner with State child welfare agencies to help address and eliminate disparities in the child welfare system experienced by LGBTQI+ children, parents, and caregivers, including: the over-representation of LGBTQI+ youth in the child welfare system, including over-representation in congregate placements; disproportionately high rates of abuse, and placements in unsupportive or hostile environments faced by LGBTQI+ youth in foster care; disproportionately high rates of homelessness faced by LGBTQI+ youth who exit foster care; and discrimination faced by LGBTQI+ parents, kin, and foster and adoptive families. The initiative, as appropriate and consistent with applicable law, shall also take actions to:

- (i) seek funding opportunities for programs and services that improve outcomes for LGBTQI+ children in the child welfare system;

- (ii) provide increased training and technical assistance to State child welfare agencies and child welfare personnel on promising practices to support LGBTQI+ youth in foster care and LGBTQI+ parents and caregivers;
  - (iii) develop sample policies for supporting LGBTQI+ children, parents, and caregivers in the child welfare system;
  - (iv) promote equity and inclusion for LGBTQI+ foster and adoptive parents in their interactions with the child welfare system;
  - (v) evaluate the rate of child removals from LGBTQI+ families of origin, in particular families that include LGBTQI+ women of color, and develop proposals to address any disproportionate rates of child removals faced by such families;
  - (vi) assess and improve the responsible collection and use of data on sexual orientation and gender identity in the child welfare system to measure and address inequities faced by LGBTQI+ children, parents, and caregivers, while safeguarding the privacy, safety, and civil rights of LGBTQI+ youth; and
  - (vii) advance policies that help to prevent the placement of LGBTQI+ youth in foster and congregate care environments that will be hostile to their gender identity or sexual orientation.
- (c) The Attorney General shall establish a clearinghouse within the Office of Juvenile Justice and Delinquency Prevention to provide effective training, technical assistance, and other resources for jurisdictions seeking to better serve LGBTQI+ youth using a continuum-of-care framework. The clearinghouse shall include juvenile justice and delinquency prevention programs addressing the needs, including mental health needs, of LGBTQI+ youth.

Sec. 6. Reviewing Eligibility Standards for Federal Benefits and Programs. (a) Within 180 days of the date of this order, the Secretary of HHS shall conduct a study on the impact that current Federal statutory and regulatory eligibility standards have on the ability of LGBTQI+ and other households as determined by the Secretary to access Federal benefits and programs for families, and shall produce a public report with findings and recommendations that could increase LGBTQI+ and such other households' participation in and eligibility for Federal benefits and programs for families.

(b) Within 100 days of the release of the recommendations required by subsection (a) of this section, the Director of the Office of Management and Budget (OMB) shall coordinate with executive departments and agencies (agencies) that administer programs that establish

eligibility standards for participation by families to complete a review of agencies' current eligibility standards for families. Such agencies shall seek opportunities, consistent with applicable law, to adopt more inclusive eligibility standards in line with the recommendations in the report produced pursuant to subsection (a) of this section.

Sec. 7. Safeguarding Access to Health Care and Other Health Supports for LGBTQI+ Individuals. The Secretary of HHS shall establish an initiative to address the health disparities facing LGBTQI+ youth and adults, take steps to prevent LGBTQI+ suicide, and address the barriers and exclusionary policies that LGBTQI+ individuals and families face in accessing quality, affordable, comprehensive health care, including mental health care, reproductive health care, and HIV prevention and treatment. As part of that initiative, the Secretary of HHS shall, as appropriate and consistent with applicable law:

- (a) seek funding opportunities related to health, including mental health, for LGBTQI+ individuals, especially youth, including resources for the Nation's suicide prevention and crisis support services to support LGBTQI+ individuals;
- (b) promote expanded access to comprehensive health care for LGBTQI+ individuals, including by working with States on expanding access to gender-affirming care;
- (c) issue guidance through the Substance Abuse and Mental Health Services Administration and the Office of the Assistant Secretary for Health, within 100 days of the date of this order, on providing evidence-informed mental health care and substance use treatment and support services for LGBTQI+ youth; and
- (d) develop and issue a report, within 1 year of the date of this order, and after consultation with medical experts, medical associations, and individuals with lived expertise, on promising practices for advancing health equity for intersex individuals.

Sec. 8. Supporting LGBTQI+ Students in our Nation's Schools and Educational Institutions. The Secretary of Education shall establish a Working Group on LGBTQI+ Students and Families, which shall lead an initiative to address discrimination against LGBTQI+ students and strengthen supports for LGBTQI+ students and families. Through that Working Group, the Secretary of Education shall, as appropriate and consistent with applicable law:

- (a) review, revise, develop, and promote guidance, technical assistance, training, promising practices, and sample policies for States, school districts, and other educational institutions to promote safe and inclusive learning environments in which all LGBTQI+ students thrive and to address bullying of LGBTQI+ students;

(b) identify promising practices for helping to ensure that school-based health services and supports, especially mental health services, are accessible to and supportive of LGBTQI+ students;

(c) seek funding opportunities for grantees and programs that will improve educational and health outcomes, especially mental health outcomes, for LGBTQI+ students and other underserved students; and

(d) seek to strengthen supportive services for LGBTQI+ students and families experiencing homelessness, including those provided by the National Center for Homeless Education.

Sec. 9. Preventing and Ending LGBTQI+ Homelessness and Housing Instability. (a) The Secretary of Housing and Urban Development (HUD) shall establish a Working Group on LGBTQI+ Homelessness and Housing Equity, which shall lead an initiative that aims to prevent and address homelessness and housing instability among LGBTQI+ individuals, including youth, and households. As part of that initiative, the Secretary of HUD shall, as appropriate and consistent with applicable law:

(i) identify and address barriers to housing faced by LGBTQI+ individuals, including youth, and families that place them at high risk of housing instability and homelessness;

(ii) provide guidance and technical assistance to HUD contractors, grantees, and programs on effectively and respectfully serving LGBTQI+ individuals, including youth, and families;

(iii) develop and provide guidance, sample policies, technical assistance, and training to Continuums of Care, established pursuant to HUD's Continuum of Care Program; homeless service providers; and housing providers to improve services and outcomes for LGBTQI+ individuals, including youth, and families who are experiencing or are at risk of homelessness, and to ensure compliance with the Fair Housing Act, 42 U.S.C. 3601 *et seq.*, and HUD's 2012 and 2016 Equal Access Rules; and

(iv) seek funding opportunities, including through the Youth Homelessness Demonstration Program, for culturally appropriate services that address barriers to housing for LGBTQI+ individuals, including youth, and families, and the high rates of LGBTQI+ youth homelessness.

(b) The Secretary of HHS, through the Assistant Secretary for Family Support, shall, as appropriate and consistent with applicable law:

(i) use agency guidance, training, and technical assistance to implement non-discrimination protections on the basis of sexual orientation and gender identity in programs established

pursuant to the Runaway and Homeless Youth Act (Public Law 110-378), and ensure that such programs address LGBTQI+ youth homelessness; and

(ii) coordinate with youth advisory boards funded through the Runaway and Homeless Youth Training and Technical Assistance Center and the National Runaway Safeline to seek input from LGBTQI+ youth who have experienced homelessness on improving federally funded services and programs.

Sec. 10. Strengthening Supports for LGBTQI+ Older Adults. The Secretary of HHS shall address discrimination, social isolation, and health disparities faced by LGBTQI+ older adults, including by:

(a) developing and publishing guidance on non-discrimination protections on the basis of sex, including sexual orientation, gender identity, and sex characteristics, and other rights of LGBTQI+ older adults in long-term care settings;

(b) developing and publishing a document parallel to the guidance required by subsection (a) of this section in plain language, titled “Bill of Rights for LGBTQI+ Older Adults,” to support LGBTQI+ older adults and providers in understanding the rights of LGBTQI+ older adults in long-term care settings;

(c) considering whether to issue a notice of proposed rulemaking to clarify that LGBTQI+ individuals are included in the definition of “greatest social need” for purposes of targeting outreach, service provision, and funding under the Older Americans Act, 42 U.S.C. 3001 *et seq.*; and

(d) considering ways to improve and increase appropriate data collection on sexual orientation and gender identity in surveys on older adults, including by providing technical assistance to States on the collection of such data.

Sec. 11. Promoting Inclusive and Responsible Federal Data Collection Practices. (a) Advancing equity and full inclusion for LGBTQI+ individuals requires that the Federal Government use evidence and data to measure and address the disparities that LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and civil rights.

(b) To advance the responsible and effective collection and use of data on sexual orientation, gender identity, and sex characteristics (SOGI data), the Co-Chairs of the Interagency Working Group on Equitable Data established in Executive Order 13985 of January 20, 2021 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government), shall, within 30 days of the date of this order, establish a subcommittee on SOGI data to

coordinate with agencies on strengthening the Federal Government’s collection of SOGI data to advance equity for LGBTQI+ individuals. Within 120 days of the date of this order, the subcommittee shall, in coordination with the Director of OMB, develop and release a Federal Evidence Agenda on LGBTQI+ Equity, which shall:

- (i) describe disparities faced by LGBTQI+ individuals that could be better understood through Federal statistics and data collection;
  - (ii) identify, in coordination with agency Statistical Officials, Chief Science Officers, Chief Data Officers, and Evaluation Officers, Federal data collections where improved SOGI data collection may be important for advancing the Federal Government's ability to measure disparities facing LGBTQI+ individuals; and
  - (iii) identify practices for all agencies engaging in SOGI data collection to follow in order to safeguard privacy, security, and civil rights, including with regard to appropriate and robust practices of consent for the collection of this data and restrictions on its use or transfer.
- (c) Within 200 days of the date of this order, the head of each agency that conducts relevant programs or statistical surveys related to the Federal Evidence Agenda on LGBTQI+ Equity shall submit to the Co-Chairs of the Interagency Working Group on Equitable Data a SOGI Data Action Plan, which shall detail how the agency plans to use SOGI data to advance equity for LGBTQI+ individuals and shall identify how the agency plans to implement the recommendations in the Federal Evidence Agenda on LGBTQI+ Equity.
- (d) To support implementation of agency SOGI Data Action Plans, the head of each agency shall include in the agency's annual budget submission to the Director of OMB a request for any necessary funding increases to support improved SOGI data practices.
- (e) Within 180 days of the date of this order, to support agencies in appropriately collecting and using SOGI data, the Director of OMB, through the Chief Statistician of the United States, shall publish a report with recommendations for agencies on the best practices for the collection of SOGI data on Federal statistical surveys, including strategies to preserve data privacy and safety.
- (f) On an annual basis, the Director of OMB, through the Chief Statistician of the United States, shall evaluate the efficacy of SOGI data practices across agencies, and shall consider whether to update reports, guidance, or directives based upon the latest evidence and research as needed.



Sec. 12. Reporting. Within 1 year of the date of this order:

- (a) The Attorney General shall submit a report to the President through the Assistant to the President for Domestic Policy (APDP) detailing progress in implementing section 5 of this order;
- (b) The Secretary of HHS shall submit a report to the President through the APDP detailing progress in implementing sections 2 through 7 and 9 through 11 of this order;
- (c) The Secretary of Education shall submit a report to the President through the APDP detailing progress in implementing sections 2, 8, and 11 of this order;
- (d) The Secretary of HUD shall submit a report to the President through the APDP detailing progress in implementing sections 9 and 11 of this order;
- (e) The Secretary of State shall submit a report to the President through the APDP detailing progress in implementing section 3 of this order;
- (f) The Director of OMB shall submit a report to the President through the APDP detailing progress in implementing sections 6 and 11 of this order; and
- (g) The Director of OMB, through the Chief Statistician of the United States, shall submit a report to the President through the APDP detailing progress in implementing section 11 of this order.

Sec. 13. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

- (i) the authority granted by law to an executive department or agency, or the head thereof; or
  - (ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.
- (b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

JOSEPH R. BIDEN JR.

THE WHITE HOUSE,

June 15, 2022.



## APPENDIX D

BRIEFING ROOM

# FACT SHEET: President Biden to Sign Historic Executive Order Advancing LGBTQI+ Equality During Pride Month

JUNE 15, 2022 • STATEMENTS AND RELEASES

President Biden believes that no one should face discrimination because of who they are or whom they love. Since President Biden took office, he has championed the rights of LGBTQI+ Americans and people around the world, accelerating the march towards full equality.

As President Biden said during his first joint address to Congress, the President has the back of LGBTQI+ people across the country. That is why he taking these bold actions and continuing to fight for full equality for every American – including urging Congress pass the Equality Act and provide overdue civil rights protections for LGBTQI+ people.

Today, to mark Pride Month, President Biden will sign an Executive Order Advancing Equality for LGBTQI+ Individuals, and he will welcome LGBTQI+ families, advocates, elected officials, and leaders to the White House for a reception.

President Biden's Executive Order builds on the historic progress he has made for LGBTQI+ people by:

- Addressing discriminatory legislative attacks against LGBTQI+ children and families, directing key agencies to protect families and children;
- Preventing so-called “conversion therapy” with a historic initiative to protect children from the harmful practice;
- Safeguarding health care, and programs designed to prevent youth suicide;
- Supporting LGBTQI+ children and families by launching a new initiative to protect foster youth, prevent homelessness, and improve access to federal programs; and
- Taking new, additional steps to advance LGBTQI+ equality.

### ADDRESSING DISCRIMINATORY LEGISLATIVE ATTACKS

Over 300 anti-LGBTQI+ laws have been introduced in state legislatures over the past year, and many of them specifically target transgender children and their parents by banning access to medical care and support at school. President Biden is addressing these harmful, hateful, and discriminatory attacks head-on – not only by speaking up for America's families, but taking action to stand up to the bullies targeting LGBTQI+ people.

To help support impacted families, President Biden is charging the Department of Health and Human Services (HHS) with protecting LGBTQI+ children and families from attacks on their

access to health care, and has instructed HHS to release new sample policies for states on how to expand access to comprehensive health care for LGBTQI+ patients. The President is also directing the Department of Education with addressing the impacts of state laws that target LGBTQI+ students, and has charged the department with releasing a sample school policy for achieving full inclusion for LGBTQI+ students.

### **ADDRESSING “CONVERSION THERAPY”**

As a candidate, President Biden pledged to help end so-called “conversion therapy” – a discredited and dangerous practice that seeks to suppress or change the sexual orientation or gender identity of LGBTQI+ people. Today, President Biden is using his executive authority to launch an initiative to protect children across America and crack down on this harmful practice, which every major medical association in the United States has condemned.

Children who are exposed to so-called “conversion therapy” face higher rates of attempted suicide and trauma. Numerous states across the country have already passed bipartisan laws to prevent exposure to so-called “conversion therapy,” with Republican and Democratic governors signing state bans on conversion therapy into law. Yet despite these efforts, many people in the United States and around the world are still subjected to this practice.

President Biden is charging HHS with leading an initiative to reduce the risk of youth exposure to this dangerous practice. HHS will explore guidance to clarify that federally-funded programs cannot offer so-called “conversion therapy.” HHS will also increase public awareness about its harms, provide training and technical assistance to health care providers, and expand support for services to help survivors.

President Biden is also encouraging the Federal Trade Commission to consider whether the practice constitutes an unfair or deceptive act or practice, and whether to issue consumer warnings or notices. And, he is directing the Secretaries of State, Treasury, and HHS to develop an action plan to promote an end to so-called “conversion therapy” around the world and ensure that U.S. foreign assistance dollars do not fund the practice.

### **SAFEGUARDING HEALTH CARE AND PREVENTING LGBTQI+ YOUTH SUICIDE**

Because of discrimination and bullying, nearly half of LGBTQI+ youth seriously considered suicide last year. LGBTQI+ people of all ages also face significant barriers to accessing health care, and LGBTQI+ patients face significant health disparities. To safeguard access to health care for LGBTQI+ patients and address the LGBTQI+ youth mental health crisis, President Biden is charging HHS with taking steps to address the barriers and exclusionary policies that LGBTQI+ individuals and families face in accessing quality, affordable, comprehensive health care, including mental health care, reproductive health care, and HIV prevention and treatment. The President’s Order charges HHS to work with states to promote expanded access to gender-affirming care. It also charges HHS to help prevent LGBTQI+ suicide by expanding youth access to suicide prevention resources, and to issue new guidance through the Substance Abuse and Mental Health Services Administration on providing evidence-informed mental health care for LGBTQI+ youth.

### **SUPPORTING LGBTQI+ CHILDREN AND FAMILIES**

LGBTQI+ children and families deserve the same dignity and respect as all American families. But LGBTQI+ children and families continue to face significant barriers and discrimination. For LGBTQI+ young people, family rejection can lead to disproportionately high rates of homelessness and over-representation in foster care. And for LGBTQI+ parents and households, significant barriers remain in accessing vital government benefits and services, and achieving housing security. Providing these young Americans and families with the resources and support they need will help ensure more children and families have access to loving homes that decrease the risk of abuse and suicide. President Biden's Executive Order will:

- Address discrimination and barriers faced by LGBTQI+ youth, parents, caretakers, and families in foster care.** Although LGBTQI+ parents play a vital role in ensuring that every child in America has a loving home, and are seven times more likely to adopt a child from foster care, these parents continue to face barriers and biases in the child welfare system. To address these disparities, President Biden is charging HHS with strengthening LGBTQI+ non-discrimination protections in the foster care system. His Executive Order also charges HHS with launching a new initiative to partner with state child welfare agencies to improve outcomes for LGBTQI+ youth in care; increase training for child welfare personnel on best practices for supporting LGBTQI+ youth; promote placements of children into environments that will support their sexual orientation and gender identity; and study and address the disproportionate rates of child removals that LGBTQI+ parents face, especially women of color.
- Support families with LGBTQI+ youth.** When youth come out as LGBTQI+, parents and family members often seek help to learn how to best support their child. When children face rejection by their families, they risk higher rates of homelessness and attempted suicide. To support families with LGBTQI+ youth, President Biden is directing HHS to expand access to voluntary family counseling and support programs to help support youth and families. The President's Executive Order also charges the Center for Disease Control and Prevention with researching the impacts of family rejection on the mental health and long-term wellbeing of LGBTQI+ individuals.
- Review access, and barriers, for families to federal programs and benefits.** In spite of important progress in ensuring that same-sex married couples can access federal programs, many LGBTQI+ families continue to face barriers in accessing vital benefits and services. For LGBTQI+ people who have faced family rejection and rely on family structures without legal or blood ties, these barriers can be particularly pronounced. To strengthen supports for all families, the President's Executive Order directs HHS to conduct a study of how current eligibility standards for federal programs impact LGBTQI+ and other households, and issue recommendations for more inclusive standards. The Executive Order also directs the Office of Management and Budget to coordinate with agencies as they seek opportunities to implement those recommendations in their programs and services.
- Address LGBTQI+ homelessness and housing instability.** President Biden is directing the Department of Housing and Urban Development with launching a new Working Group on LGBTQI+ Homelessness and Housing Equity. That Working Group will lead new efforts

to identity and address the barriers to housing faced by LGBTQI+ people, provide guidance and technical assistance to housing providers on serving LGBTQI+ individuals, and seek new funding opportunities for culturally appropriate services that address barriers to housing for LGBTQI+ individuals.

- **Support LGBTQI+ students in our Nation’s schools and educational institutions.** The President’s Executive Order directs the Department of Education to establish a new Working Group on LGBTQI+ Students and Families, which will advance policies for states, school districts, and other educational institutions to promote safe and inclusive learning environments in which all students thrive.
- **Support LGBTQI+ youth in juvenile justice systems.** The Executive Order charges the Attorney General with establishing a new clearinghouse within the Office of Juvenile Justice and Delinquency Prevention to provide effective training, technical assistance, and other resources for jurisdictions to better serve LGBTQI+ youth involved in the juvenile justice system.

### ADDITIONAL STEPS TO ADVANCE LGBTQI+ EQUALITY

President Biden’s Executive Order also includes additional new steps to advance LGBTQI+ equality, including:

- **Strengthen supports for LGBTQI+ older adults.** Older LGBTQI+ people face significant rates of discrimination, isolation, and poverty. The President’s Executive Order directs HHS to publish a “Bill of Rights for LGBTQI+ Older Adults” and new guidance on the non-discrimination protections for older adults in long-term care settings. It also charges HHS with exploring new rulemaking to establish that LGBTQI+ individuals are included in the definition of populations of “greatest social need” under the Older Americans Act.
- **Promote expanded federal data collection on sexual orientation and gender identity.** To strengthen the federal collection of sexual orientation and gender identity (“SOGI”) data, the President’s Executive Order establishes a new federal coordinating committee on SOGI data, which will lead efforts across agencies to identify opportunities to strengthen SOGI data collection, while safeguarding privacy protections and civil rights for LGBTQI+ individuals.

### BUILDING ON HISTORIC PROGRESS

Today’s announcements build on the Biden-Harris Administration’s historic progress to advance LGBTQI+ equality since taking office, including:

- **Strengthening civil rights protections.** On his first day in office, President Biden signed an Executive Order on preventing and combatting discrimination against LGBTQI+ Americans.
- **Ending the ban on transgender servicemembers, and supporting LGBTQI+ service members and veterans.** President Biden rescinded the discriminatory ban on transgender servicemembers, and the Department of Defense announced that HIV-positive service members with an undetectable viral load will no longer be categorically barred from

deploying worldwide or commissioning, nor will they be discharged or separated, solely on the basis of their HIV-positive status. The Department of Veterans Affairs also strengthened services and supports for LGBTQI+ veterans, including by removing the outdated ban on comprehensive gender-affirming care for transgender veterans.

- **Fighting back against state-level attacks on LGBTQI+ children.** The Department of Justice has intervened and filed statements of interest in lawsuits across the country challenging state laws that seek to ban transgender children from accessing gender-affirming health care and participating in school activities as unconstitutional.
- **Advancing human rights for LGBTQI+ people in America's foreign policy.** President Biden signed a [Presidential Memorandum on Advancing the Human Rights of LGBTQI+ Persons Around the World](#), and appointed the first Special Envoy to Advance the Human Rights of LGBTQI+ Persons at the State Department.
- **Strengthening supports and protections for transgender Americans.** The State Department now offers an "X" gender marker option to ensure nonbinary Americans can access an accurate federal ID. The Department of Homeland Security announced reforms to address barriers and heightened screening that transgender travelers often face in U.S. airports. The Department of Housing and Urban Development also restored key protections to ensure that transgender people experiencing homelessness can access emergency shelters consistent with their gender identity.
- **Fighting for passage of the Equality Act.** President Biden continues to call on the Senate to swiftly pass the Equality Act, legislation, which will provide long overdue federal civil rights protections to LGBTQI+ Americans and their families.
- **Renewing the U.S. government's commitment to ending the HIV epidemic at home and around the world.** President Biden released a new [National HIV/AIDS Strategy](#) to lead us toward ending the HIV epidemic in the United States by 2030. The President reestablished the White House Office of National AIDS Policy, and has made historic investments in ending the HIV epidemic globally.
- **Appointing LGBTQI+ leaders to the highest levels of our government.** President Biden has appointed a historically diverse Administration, including Secretary Pete Buttigieg, the first openly gay Cabinet Secretary; Assistant Secretary for Health Admiral Rachel Levine, the first openly transgender person ever confirmed by the U.S. Senate; Ambassador Chantale Wong, the first open lesbian to achieve the rank of Ambassador; and the first openly gay White House Counsel, Stuart Delery. Fourteen percent of the President's appointees identify as LGBTQI+.
- **Ensuring the federal government is a model employer for LGBTQI+ public servants.** President Biden signed an [Executive Order on Advancing Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce](#), with key provisions for LGBTQI+ public servants.
- **Celebrating Pride at home and around the world.** Pride is back at the White House and federal buildings throughout the country are proudly flying Pride flags this month. The

State Department announced it will allow U.S. embassies and diplomatic outposts to fly the Pride flag on the same flagpole as the U.S. flag at their embassy or consulate.

###



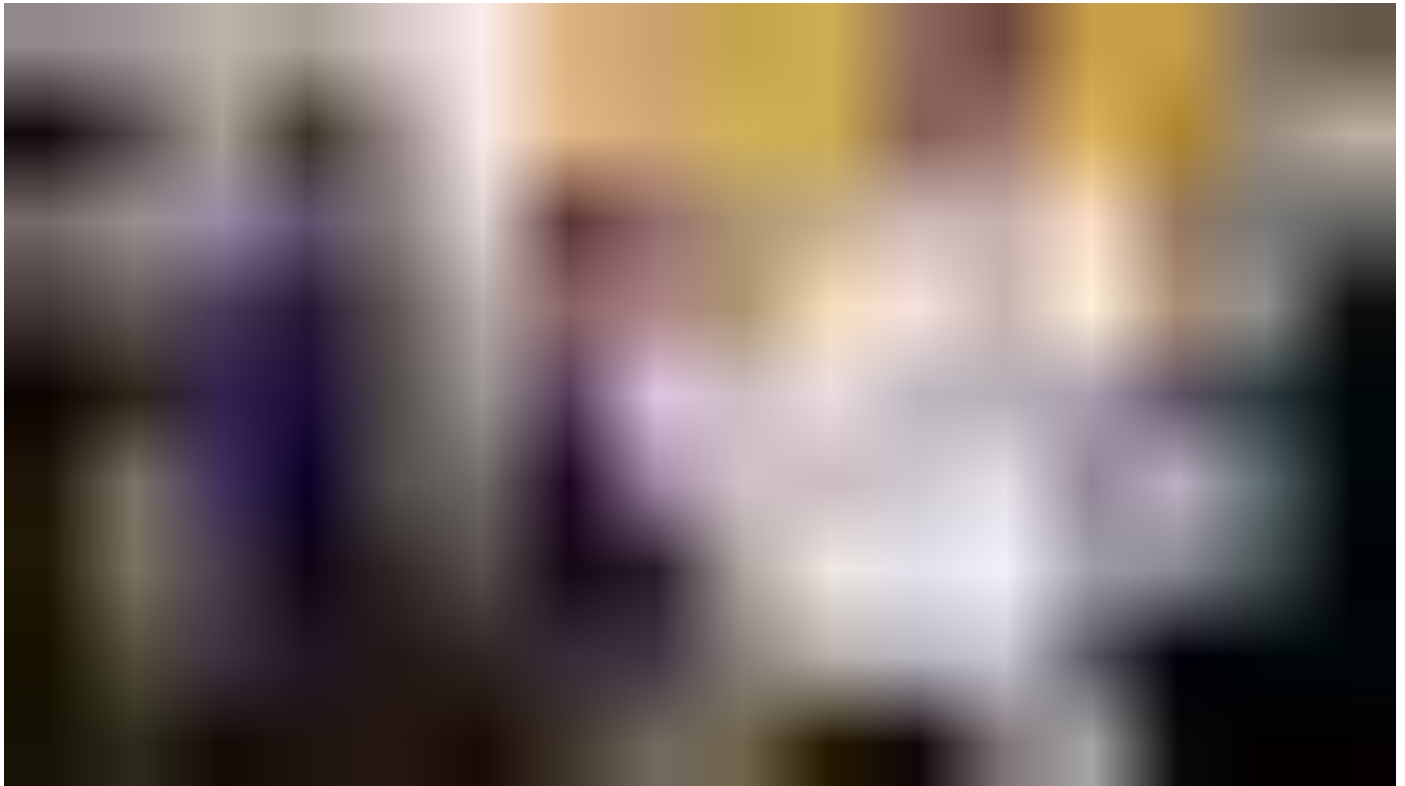




APPENDIX E

# Biden seeks to counter 'legislative attacks' on LGBTQ rights

A new executive order seeks to discourage "conversion therapy" while also promoting gender-affirming surgery.





Author: WILL WEISSERT (Associated Press)

Published: 12:09 PM EDT June 17, 2022

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WASHINGTON — President Joe Biden issued an [executive order](#) Wednesday to stymie what his administration calls discriminatory legislative attacks on the LGBTQ community by Republican-controlled states, declaring before a signing ceremony packed with activists, “pride is back at the White House.”

The order seeks to discourage “conversion therapy” — a discredited practice that aims to change a person’s sexual orientation or gender identity — while also promoting gender-affirming surgery and expanding foster care protections for gay and transgender parents and children.

Tapping money already allocated to federal agencies rather than requiring new funding, Biden said the order is meant to counter 300-plus anti-LGBTQ

laws introduced by state lawmakers over the past year alone. The Department of Health and Human Services will draft new policies to expand care to LGBTQ families and the Education Department will devise rules to better protect LGBTQ students in public schools.

The president, first lady Jill Biden and Vice President Kamala Harris attended a crowded reception in the White House's East Room, where the adjacent hallway was decorated in rainbow colors. Attending were LGBTQ activists, House Speaker Nancy Pelosi and other members of Congress, and top administration officials, including Transportation Secretary Pete Buttigieg, who adopted twins with his husband, Chasten.

The gathering is part of the Biden administration's recognition of [Pride Month](#).

"All of you in this room know better than anyone that these attacks are real and consequential for real families," the president said before sitting to sign the order. He pointed specifically to the arrest last weekend of 31 members of the white supremacist group Patriot Front near an Idaho pride event.

## LGBTQ+ youth speak out about legislation targeting them

Actions listed within the order attempt to bolster programs better addressing the issue of suicide among LGBTQ children and seek to make adoptions easier for LGBTQ parents and children.

"It shouldn't take courage to be yourself," said Jill Biden, who noted that it was a little too hot and humid in summer sun-drenched Washington to hold the event on the South Lawn. "We know that, in places across the country like Florida or Texas or Alabama, rights are under attack. And we know that in small towns and big cities, prejudice, and discrimination still lurk."

Among the state laws the White House has opposed is the so-called ["Don't Say Gay"](#) measure in Florida, which was signed by Republican Gov. Ron DeSantis in March. It bars instruction on sexual orientation and gender identity in kindergarten through third grade. Critics say it marginalizes

LGBTQ people, and the law sparked a [public battle between the state and the Walt Disney Co.](#)

Vizio 2022 85-inch P-Series Quantum X (P85QX-J01) | Unboxing, Setup, Impressions

Biden's action creates a federal working group to help combat LGBTQ homelessness and one promoting educational policies for states and school districts that encourage inclusive learning environments for LGBTQ children. His order also establish new rules to discourage conversion therapy, though efforts to enforce bans against it in places where state law allows the practice will rely on legal challenges from outside the White House.

While some Republican-led legislatures have championed conversion therapy, other states and communities have banned it. The American Psychological Association says conversion therapy is not based on science and is harmful to a participant's mental health.

The order further directs health officials to spell out that federally funded programs cannot be used to fund conversion therapy. And it seeks to ease barriers to health care and certain types of treatment for the LGBTQ community, including gender affirming surgery.

That follows Republican Gov. Greg Abbott's February order directing Texas' child welfare agency to investigate reports of gender-confirming care for kids as abuse. A judge has since issued a restraining order that halted investigations into three families, and prevented others.

"We have a lot more work to do," Biden said. "In Texas, knocking on front doors to harass and investigate parents who are raising transgender children. In Florida, going after Mickey Mouse for God's sake."

In earlier orders, Biden has [sought to direct](#) that gay and transgender people are protecting from discrimination in schools, health care, housing and at work. He ordered federal agencies to update and expand regulations prohibiting sexual discrimination to include sexual orientation and gender identity, and reversed a ban on transgender people serving in the military.

Biden on Wednesday also renewed his calls for Congress to pass the [Equality Act](#), which would amend existing civil rights law to explicitly include sexual orientation and gender identification as protected characteristics. The measure has been stalled on Capitol Hill but the president said it's necessary to "enshrine the long overdue civil rights protections of all Americans, every American."

*Associated Press writer Aamer Madhani contributed to this report.*



APPENDIX F

# Deputy CIA chief briefs senators on 'Havana Syndrome' as U.S. prepares to pay victims

Some payments are expected to exceed \$100,000 per person, people familiar with a classified briefing said.

June 23, 2022, 5:08 PM EDT



WASHINGTON — Top Biden administration officials told senators Thursday that the government will soon release its plan to issue payments to U.S. diplomats and intelligence officers who suffered mysterious injuries abroad

known as "Havana Syndrome," four people with knowledge of the matter told NBC News.

In a classified briefing, Deputy CIA Director David Cohen and Assistant FBI Director Alan Kohler updated a group of senators on the latest on the yearslong investigation into the injuries, which the administration calls "anomalous health incidents." They were joined by Melissa Dalton, the Defense Department's assistant secretary overseeing the Western Hemisphere, and by senior officials from the Justice Department, the Homeland Security Department and the National Counterintelligence and Security Center.

It was unclear what information they provided about the investigation into the incidents, which remain unexplained more than five years after U.S. diplomats and spies in Havana began to report experiencing strange sounds and sensations followed by a variety of symptoms, including brain injury. U.S. officials familiar with the investigation say the U.S. has still not determined a cause.

State Department and CIA officials told senators that within days, the administration will release a plan to compensate U.S. personnel who have suffered injuries and how much to pay them, with some payments expected to exceed \$100,000 per person, people familiar with the briefing said.

The Washington Post first [reported](#) that victims could receive six-figure compensation.



The plan will come in the form of new regulations called for under the HAVANA Act, which President Joe Biden signed into law last year. The law gave the secretary of state and the CIA the authority to determine who is eligible for the payments, a [thorny task](#) given the wide disagreement over what should be considered legitimate, "confirmed" cases.

There have also been longstanding tensions over Havana Syndrome between the CIA and the State Department, which have pursued different approaches to responding to incidents reported by their employees.

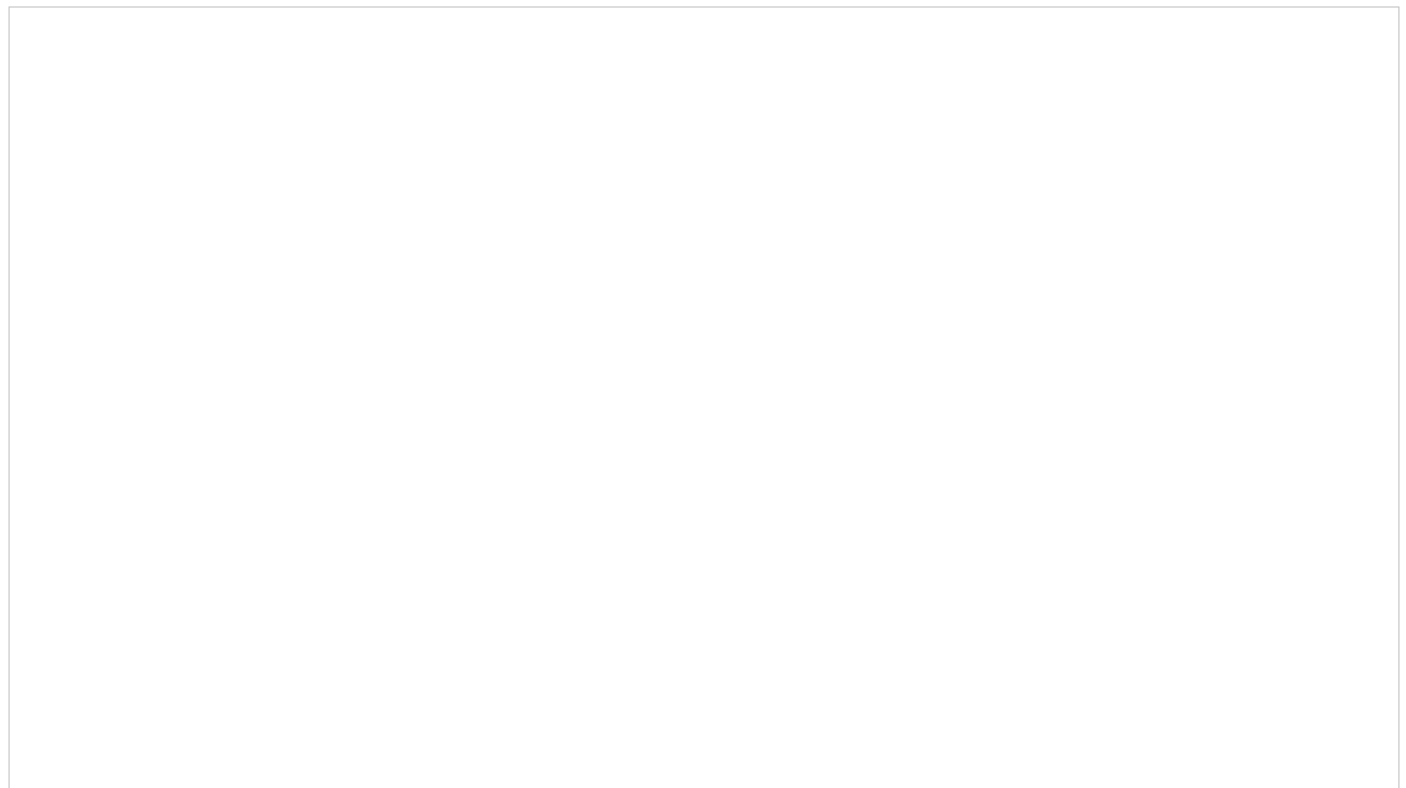
The dollar ranges for how much people could receive are still being finalized, and they could change, people briefed on the plan said. The Biden administration has already missed an April deadline to propose a system for who will be eligible and for what sum.

The State Department declined to comment on the briefing with senators. It said it would release more information about the compensation proposal

"soon."

"The department is doing everything possible to ensure that employees who report an AHI receive immediate and appropriate attention and care," a State Department spokesperson said, using an initialism for "anomalous health incident."

A spokesperson for the Office of the Director of National Intelligence declined to comment on the briefing.



A provision added to an annual military spending bill by Sens. Jeanne Shaheen, D-N.H., and Susan Collins, R-Maine, requires the administration to brief lawmakers periodically about the status of the investigation.

Yet there have been few public updates about what the government has learned about the cause of the incidents since early in the year, when a pair of intelligence assessments added fresh uncertainty to the question of how many Americans were affected and by what.

In January, a CIA interim assessment ruled out the possibility of a sustained global campaign by a foreign power to hurt Americans, but it said about two dozen cases remain unexplained and could have resulted from hostile acts. Weeks later, a panel of scientific experts enlisted by U.S. intelligence agencies concluded at least some injuries were most likely caused by pulsed electromagnetic energy from an external device.

"The U.S. government continues to take all reports of AHI seriously," a White House National Security Council spokesman said. "We remain committed to ensuring that individuals who report an AHI have access to medical care, and we will continue to rigorously investigate the cause of these incidents."

Starting in late 2016, U.S. diplomats and intelligence officers serving in Havana began reporting bizarre sounds and physical sensations followed by unexplained illnesses and symptoms, including vision and hearing loss, memory and balance issues, headaches, nausea and nosebleeds. In the years since then, many hundreds of U.S. government workers in more than a dozen countries came forward reported suspected incidents, NBC News has reported.

Shaheen, who also wrote the legislation authorizing the monetary payments for a "qualifying injury to the brain," said Senate Democrats and Republicans continue to work to ensure that public servants injured on the job have access to resources "to heal and recover."

"There is a lot we still don't know about directed-energy attacks but what we do know is that the injuries are real," Shaheen said in a statement Thursday. "Much work remains to get to the bottom of these attacks to understand how our government can best assist victims — that work goes on."

Since the incidents first became public in 2017, Cuba has adamantly denied any knowledge of or involvement in any attacks on U.S. diplomats. U.S.

intelligence officials have long considered Russia a leading suspect, NBC News has reported; Moscow has firmly denied being involved. Some U.S. officials and experts who have studied the cases have raised the possibility that mass hysteria could explain many of the cases, although doctors treating the victims say at least some of them have concrete medical findings similar to mild traumatic brain injury.

## APPENDIX G

# U.S. to give some 'Havana syndrome' victims six-figure compensation



President Biden meets with members of the Wounded Warrior Project's Soldier Ride, on the South Lawn of the White House in Washington, D.C., on Thursday. The event helps raise awareness to the public about severely injured veterans and provides rehabilitation opportunities. (Drew Angerer/Getty Images)

President Biden meets with members of the Wounded Warrior Project's Soldier Ride, on the South Lawn of the White House in Washington, D.C., on Thursday. The event helps raise awareness to the public about severely injured veterans and provides rehabilitation opportunities. (Drew Angerer/Getty Images)

The Biden administration plans to pay some diplomats and intelligence officers roughly \$100,000 to \$200,000 each to compensate for the mysterious health problems known as "Havana syndrome," according to congressional aides and a former official familiar with the matter.

The payment plan is the culmination of a multiyear push by Congress, which passed a law last fall mandating that the State Department and CIA compensate current and former officials suffering from what the government calls Anomalous Health Incidents, or AHIs.

Despite six years of investigations, the United States still lacks certainty about what is causing the symptoms, which include headaches, vision problems, dizziness and brain fog, among other ailments. The health problems were first reported among U.S. diplomats and intelligence officers serving in Cuba's capital but have since been reported on every continent except Antarctica.

The six-figure payments will go to those determined to have suffered the most significant setbacks, such as job loss or career derailment, said people briefed on the plan who like others spoke on the condition of anonymity because the plan has not been approved for release.

U.S. officials cautioned that the range of compensation is not yet final and could change as the State Department's regulation goes through the final stages of a review process, which is coordinated by the Office of Management and Budget.

The CIA determined this winter that a foreign country is [probably not](#) behind a "worldwide campaign harming U.S. personnel with a weapon or mechanism" — an assessment that raised doubts about years of speculation that the health issues were the result of a mysterious directed energy weapon wielded by Russian or Chinese agents.

Government investigators have reviewed more than 1,000 cases, with the majority being attributed to a preexisting medical condition or environmental or other factors. Dozens of other reported cases remain unexplained.

As word of the compensation packages has trickled out to the federal workforce, some officials have remarked that the packages were generous while others have said the compensation range seems insufficient, given the loss of future and past income for those who suffered severe neurological damage and can no longer work.

The Biden administration has not yet released the criteria for how it will determine eligibility for compensation, but it is expected to be made public shortly. Current and former officials as well as their family members will be eligible to make claims, said those briefed on the plan.

Under the Havana Act, Congress gave the secretary of state and CIA director the authority to determine eligibility, which has already caused concerns about whether diplomats and intelligence officers will be treated the same.

"It is crucial that CIA and State implement the Havana Act in an identical fashion. To include using the exact same criteria who qualifies for compensation. There cannot be any daylight between agencies, which previously was an unfortunate hallmark in how the USG responded to the AHIs," said Marc Polymeropoulos, a former senior CIA officer. He retired in 2019 while suffering symptoms, including painful headaches, after a trip to Moscow in 2017, when he was helping run clandestine operations in Russia.

Devising a compensation plan has been particularly difficult for U.S. government officials, given the lack of hard evidence for what's causing the ailments and the inability to establish a clear diagnosis for the broad range of symptoms that while sometimes debilitating can also be common.

Officials with the State Department and CIA said Thursday that the Havana Act authorized the agencies to provide payments to personnel for "qualifying injuries to the brain."

The two agencies have been working in partnership with the National Security Council on how the payment system will work and will have more information on it soon, the CIA official said.

The official added that the legislation provides the CIA and other agencies "the authority to make payments to employees, eligible family members, and other individuals affiliated with the CIA."

"As Director Burns has emphasized, nothing is more important to him and CIA leaders than taking care of our people," the official said, referencing CIA Director William J. Burns.

Officials from the National Institutes of Health, the Pentagon and other agencies have jointly developed a new, two-hour medical exam to screen potential new cases that can be administered by doctors or other practitioners to U.S. personnel assigned to overseas missions.

The triage process includes visual, vestibular and blood testing but not brain imaging, a fact that reflects constantly changing and sometimes-disputed science on the injuries. Even though some doctors previously identified ["perceptible changes" in the brain](#) as a result of apparent attacks, State Department physicians say they now believe the scans have no scientific validity.

Officials are also seeking to better educate medical staffers at missions worldwide, instructing them to be receptive to potential victims' experiences — and they stress that skepticism is no longer the norm.

In January, Secretary of State Antony Blinken said the State Department, like the CIA, was focused on providing medical care to those needing it, and would continue to seek a cause behind the health issues.



"We are going to continue to bring all of our resources to bear in learning more about these incidents, and there will be additional reports to follow. We will leave no stone unturned," he wrote.

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**From:** Raj Patel <raj@rajpatel.live>  
**Sent:** Saturday, July 2, 2022 10:12 PM  
**To:** PAED Documents  
**Subject:** NEW PRO SE FILING: Patel v. United States, No. \_\_\_\_ (E.D. Pa. 202\_)  
**Attachments:** Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form).pdf; ED Pa. Writ of Mandamus FILING.pdf

**CAUTION - EXTERNAL:**

Hello Clerk of Court,

Please see attached.

Sincerely,

TE, TE Raj Patel  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
3174506651

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

E.D. Pa. Pro Se Notice, *approved February 11, 2019, revised January 11, 2021*  
FROM THE OFFICE OF THE CLERK OF COURT,  
THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Date: 7/2/22

Case caption: PATEL v. THE UNITED STATES

Case Number: 22-2624

Case assigned to: HONORABLE WENDY BEETLESTONE

**Please put the case number on all documents you submit to the Court regarding this case. Please do not contact the Judge's chambers directly about your case. Any inquiries about your case should be directed to the Clerk's Office.**

## **NOTICE OF GUIDELINES FOR REPRESENTING YOURSELF (APPEARING "PRO SE") IN FEDERAL COURT**

The purpose of this notice is to inform you that the Court has received your filing, and to give you some information about proceeding in your case. The information in this document is also available on the Court's website.

**Appearing *Pro Se*:** If you represent yourself in Court, you are called a "*pro se* litigant" or a "self-represented litigant." "*Pro se*" is a Latin term, meaning "on one's own behalf" and a "litigant" is someone who is either suing someone or is being sued in Court. The right to appear *pro se* in a civil case in federal court is contained in a statute, 28 U.S.C. § 1654. There are, however, certain limitations to self-representation, including: (1) in general, a *pro se* litigant may only bring claims on his or her own behalf; (2) corporations must be represented by an attorney; (3) a *pro se* litigant may not represent a class in a class action; and (4) a power of attorney does not permit a *pro se* litigant who is not an attorney to represent another person in federal court.

**Scope of These Guidelines:** This document is intended to provide some basic guidelines to litigants who are proceeding without an attorney in civil cases. It is not intended as legal advice and is not a substitute for checking the rules that apply in your case. Please note that separate guidelines may apply in *habeas* cases, which are cases in which a litigant is challenging the constitutionality of his or her criminal conviction or sentence, and asking for release from prison or that the conviction be vacated.

**Current Address:** The Court will send orders or notices filed in your case to you at the address you provided to the Court. It is important to keep the Court and opposing counsel, if any, advised of your current address. Failure to do so could result in Court orders or other information not being timely delivered, which may result in your case being dismissed for failure to prosecute or otherwise affect your legal rights. The Court's local rules require you to file a notice of change of

E.D. Pa. Pro Se Notice, *approved February 11, 2019, revised January 11, 2021*

address with the Clerk of Court within fourteen (14) days of an address change. *See* Local Rule 5.1(b).

**Pennsylvania Department of Corrections (DOC) Mail Policy:** In accordance with the Pennsylvania DOC’s policy number DC-ADM 803, Court mail must be sent to an inmate within DOC custody at the facility where the inmate is housed. Accordingly, inmates confined within the DOC should provide the Court with the address for the facility in which they are housed for purposes of the docket. Inmates should not provide the Court with the address for SMART COMMUNICATIONS, which is the contractor handling non-privileged inmate mail, because Court mail cannot be received at that address.

**Form of Submitted Documents:** All documents you submit to the Court should be in the form of a pleading (*e.g.*, complaint, amended complaint), notice, motion, brief, or supporting memorandum of law. **Please put the civil action number of your case on all documents you file in your case. If you are asking the Court to act, you must file a motion.** Any motion should include the caption of your case and the case number, have a title including the word “motion,” and state the relief you would like from the Court. You should also sign and date any documents that you file with the Court. Please do not send letters to the presiding Judge or Court staff. Letters are generally not considered part of the record.

**Privacy Protection:** Federal Rule of Civil Procedure 5.2 prohibits litigants in a non-habeas proceeding from submitting documents that contain personal information. Unless the Court orders otherwise, personal identifying information in Court filings must be limited as follows:

- Social security numbers, taxpayer-identification numbers, and financial account numbers must include only the last four digits (*e.g.*, xxx-xx-1234)
- Birth dates must include the year of birth only (*e.g.*, xx/xx/2000)
- Names of persons under the age of 18 must be indicated by initials only (*e.g.*, A.B.)

You are responsible for protecting the privacy of this information in your filings. If your filings contain any information that does not comply with this rule, please black out that information before sending your filing to the Court.

**Proceeding *In Forma Pauperis*:** If you cannot afford to pay the \$350 filing fee and \$52 administrative fee to file your civil case, you may file a motion to proceed without prepayment of those fees (this is called proceeding *in forma pauperis*). If the Judge in your case allows you to proceed *in forma pauperis*, you will be permitted to proceed without prepayment of the filing fee. If you are a prisoner, however, you will be obligated to pay the filing fee in installments (see the notice to prisoner litigants). Please note that even if you are proceeding *in forma pauperis*, you must pay for copies of documents in your case.

**Notice to Prisoner Litigants:** The filing date reflected on the Court’s docket shows the date your filing was received by the Court. It may not be the legal filing date for your pleading. If you are a prisoner litigant who is proceeding *in forma pauperis* in a civil case, you will still be obligated

E.D. Pa. Pro Se Notice, *approved February 11, 2019, revised January 11, 2021*

to pay the entire \$350 filing fee in installments in accordance with the Prison Litigation Reform Act (PLRA) regardless of the outcome of your case. *See* 28 U.S.C. § 1915(b). The Court does not have the authority to waive that requirement. You will not be entitled to the return of payments made toward the fee for any reason, even if your case is dismissed before service in accordance with laws that require the Court to screen *in forma pauperis* cases and cases filed by prisoners. *See* 28 U.S.C. §§ 1915(e)(2)(B) & 1915A. If you filed a petition for a writ of *habeas corpus*, the filing fee is \$5.00. If you are granted leave to proceed *in forma pauperis* in a *habeas* case, you are not required to pay the filing fee.

**Screening Requirements:** Pursuant to 28 U.S.C. § 1915(e)(2)(B) and § 1915A, the Court screens all civil cases filed by prisoners, whether the prisoner pays the filing fee and administrative fee upfront or is granted leave to proceed *in forma pauperis*. Pursuant to 28 U.S.C. § 1915(e)(2)(B), the Court also screens all civil cases in which a plaintiff who is not a prisoner has been granted leave to proceed *in forma pauperis*. As soon as an Order is issued, a copy will be mailed to you. The Court generally will not appoint counsel, rule on motions, serve your Complaint on the Defendant(s), or require an Answer until after the screening process is complete.

**Service:** If you filed a motion to proceed without prepaying the filing fee (*in forma pauperis*) and the Court grants your motion, the Court will direct service on your behalf. The Clerk's Office will not issue summonses in your case or direct service unless your motion to proceed *in forma pauperis* is granted and the Judge in your case directs service. You may be required to complete forms (USM-285 forms) so that service can be made in your case. If you receive those forms in the mail, please complete them and return them to the U.S. Marshals Service. Failure to do so may result in the dismissal of your case. If you paid the fees for your case, the Clerk's Office will issue summonses to you, and you are responsible for serving the defendants in this case in the manner and time described in Federal Rule of Civil Procedure 4. Please note that if you are suing the United States, its agencies, corporations, officers, or employees, you must comply with Federal Rule of Civil Procedure 4(i).

**Contacting the Court:** Do not send documents directly to the District Judge or Magistrate Judge assigned to your case. All documents must be filed with the Clerk of Court at one of the following addresses:

Clerk of Court, EDPa  
James A. Byrne U.S. Courthouse  
Room 2609  
601 Market Street  
Philadelphia, PA 19106

Clerk of Court, EDPa  
Edward N. Cahn U.S. Courthouse &  
Federal Building  
504 W. Hamilton Street  
Allentown, PA 18101

You may file documents in your case in person at the above address or by mail. If you would like permission to file documents electronically, you must file a motion seeking permission from the Judge assigned to your case. *See* Local Rule 5.1.2(4)(b). If you are given permission to file electronically, the Judge may terminate your electronic filing privileges if you abuse the system by excessive filings, either in number or length.

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**Sending Documents to Opposing Parties:** All pleadings and other papers submitted to the Court must be served on opposing counsel for all other parties, or directly on any parties representing themselves (proceeding *pro se*). Service may be made by mail. You must let the Clerk know that you served your papers on the other parties by completing a certificate of service showing the date and manner of service and attaching it to the original of the documents and all copies before you send them to the Court. An example of a certificate of service by mail follows:

“I, (name), do hereby certify that a true and correct copy of the foregoing (name of pleading or other paper) has been served upon (name(s) of person(s) served) by placing the same in the U.S. mail, properly addressed, this (day) of (month), (year).

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(Signature)”

**Legal Advice:** The District Judges, Magistrate Judges, *Pro Se* Law Clerks and other Court staff cannot provide you with legal advice, meaning they cannot tell you what type of motion to file or advise you on other legal issues. However, Court staff can provide you with the proper forms and inform you of the status of your case. The Clerk of Court and other Clerk’s Office staff do not have the authority to take any action with respect to your case unless a Judge or rule authorizes the Clerk to do so.

**Rules that Apply to Your Case:** Your case is subject to the Federal Rules of Civil Procedure and the Eastern District of Pennsylvania’s Local Rules of Civil Procedure, which you can find on the Court’s website. One important rule to be aware of is Local Rule 7.1, which requires you to file and serve a proper response to all motions within fourteen (14) days unless the Judge assigned to your case directs otherwise. If you need more time to respond to a motion or comply with a deadline, you must file a motion for an extension of time. If your case is transferred to another district, the local rules in that district will apply to your case.

**Discovery:** Please review Local Rule 26.1(f), which provides that “[n]o motion or other application pursuant to the Federal Rules of Civil Procedure governing discovery or pursuant to this rule shall be made unless it contains a certification of counsel that the parties, after reasonable effort, are unable to resolve the dispute.” That means you must attempt to resolve any discovery disputes by contacting defendant’s counsel directly by telephone or through correspondence before you ask the Court for help with discovery matters. You are responsible for sending your discovery requests to the opposing party or parties in your case. Please note that interrogatories, requests for production and inspection, requests for admission, and responses to discovery requests are generally not filed with the Court. *See* Local Rule 26.1.

**Appeals:** If you want to appeal the dismissal of your case, you must file a notice of appeal in your district court case. *See* Federal Rule of Appellate Procedure 3(a). For more information about

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the appeals process, please see the website for the Third Circuit Court of Appeals for more information or contact the Third Circuit Court of Appeals.

**THIS NOTICE IS FOR INFORMATIONAL PURPOSES ONLY. PLEASE DO NOT FILE  
ANY RESPONSES TO THIS NOTICE WITH THE COURT.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>THE EXCELLENT THE EXCELLENT</b>	:	
<b>RAJ K. PATEL,</b>	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>CIVIL ACTION NO. 22-CV-2624</b>
	:	
<b>THE UNITED STATES,</b>	:	
<b>Defendant.</b>	:	

**ORDER**

**AND NOW**, this 9th day of August 2022, upon consideration of Plaintiff The Excellent The Excellent Raj K. Patel's *pro se* Complaint (ECF No. 2) it is **ORDERED** that:

1. The Clerk of Court is directed to **TRANSFER** the above-captioned case to the United States District Court for the Southern District of Indiana, Indianapolis Division.<sup>1</sup>
2. The Motion to Proceed *In Forma Pauperis* shall be left to the discretion of the transferee court.

**BY THE COURT:**

/s/Wendy Beetlestone, J.

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**WENDY BEETLESTONE, J.**

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<sup>1</sup> Patel filed this lawsuit pursuant to 42 U.S.C. § 1983 against the United States. Patel is located in Indianapolis, Indiana. The allegations in the Complaint suggest that a majority of the events giving rise to Patel's claims occurred in Brownsburg, Indiana, which is located in Hendricks County in the Southern District of Indiana. See ECF No. 2 at 12-45. As there is no apparent basis for venue in this district, the Court will transfer Patel's Complaint to the United States District Court for the Southern District of Indiana, where the events giving rise to Patel's claims occurred. See 28 U.S.C. § 94(b)(1), 1391(b) & 1406(a); *Lafferty v. St. Riel*, 495 F.3d 72, 74-75, 75 n.3 (3d Cir. 2007) (declining to disturb district court's *sua sponte* transfer under § 1406(a)); *Decker v. Dyson*, 165 F. App'x 951, 954 n.3 (3d Cir. 2006) (holding that district court may *sua sponte* transfer case under § 1406(a)).



MIME-Version:1.0  
From:insd\_cmecf@insd.uscourts.gov  
To:nef@insd.uscourts.gov  
Bcc:  
--Case Participants: Magistrate Judge Mario Garcia  
(insdusmsnotice-inbox@insd.uscourts.gov)  
--Non Case Participants:  
--No Notice Sent:  
  
Message-Id:8250941@insd.uscourts.gov  
Subject:Activity in Case 1:22-cv-01576-JPH-MG PATEL v. THE UNITED STATES Case Transferred  
In - District Transfer  
Content-Type: text/html

**U.S. District Court**

**Southern District of Indiana**

**Notice of Electronic Filing**

The following transaction was entered on 8/10/2022 at 9:39 AM EDT and filed on 8/10/2022

**Case Name:** PATEL v. THE UNITED STATES

**Case Number:** 1:22-cv-01576-JPH-MG

**Filer:**

**Document Number:** 5

**Docket Text:**

**Case transferred in from District of Pennsylvania Eastern; Case Number 2:22-cv-02624.  
Original file copy of transfer order and docket sheet received.**

**1:22-cv-01576-JPH-MG Notice has been electronically mailed to:**

**1:22-cv-01576-JPH-MG Notice has not been electronically mailed to:**

THE EXCELLENT THE EXCELLENT RAJ. K. PATEL  
6850 EAST 21st STREET  
INDIANAPOLIS, IN 46219

The following document(s) are associated with this transaction:

**United States District Court**  
**Eastern District of Pennsylvania (Philadelphia)**  
**CIVIL DOCKET FOR CASE #: 2:22-cv-02624-WB**  
***Internal Use Only***

PATEL v. THE UNITED STATES  
Assigned to: HONORABLE WENDY BEETLESTONE  
Cause: 42:1983 Civil Rights Act

Date Filed: 07/02/2022  
Jury Demand: None  
Nature of Suit: 440 Civil Rights: Other  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**THE EXCELLENT THE EXCELLENT**  
**RAJ. K. PATEL**  
*FROM ALL CAPACITIES*

represented by **THE EXCELLENT THE EXCELLENT**  
**RAJ. K. PATEL**  
6850 EAST 21st STREET  
INDIANAPOLIS, IN 46219  
Email: rajp2010@gmail.com  
PRO SE

V.

**Defendant**

**THE UNITED STATES**

Date Filed	#	Docket Text
07/02/2022	<u>1</u>	MOTION for Leave to Proceed in forma pauperis filed by THE EXCELLENT THE EXCELLENT RAJ. K. PATEL..(bw) (Entered: 07/06/2022)
07/02/2022	<u>2</u>	COMPLAINT against THE UNITED STATES, filed by THE EXCELLENT THE EXCELLENT RAJ. K. PATEL. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Appendix, # <u>3</u> E-MAIL)(bw) (Entered: 07/06/2022)
07/02/2022	<u>3</u>	PRO SE NOTICE RE:GUIDELINES (bw) (Entered: 07/06/2022)
07/07/2022	<u>1</u>	(Court only) ***Set/Clear Flags Set Flag PSO, PSLC-DP (bb) (Entered: 07/07/2022)
08/09/2022	<u>4</u>	ORDER THAT THE CLERK OF COURT IS DIRECTED TO TRANSFER THE ABOVE-CAPTIONED CASE TO THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA, INDIANAPOLIS DIVISION. THE MOTION TO PROCEED IN FORMA PAUPERIS SHALL BE LEFT TO THE DISCRETION OF THE TRANSFEREE COURT. SIGNED BY HONORABLE WENDY BEETLESTONE ON 8/9/22. 8/9/22 ENTERED AND COPIES E-MAILED.(bw) (Entered: 08/09/2022)

**UNITED STATES DISTRICT COURT**  
**for the**  
**Southern District of Indiana**

THE EXCELLENT THE EXCELLENT RAJ. K. PATEL	)	
Plaintiff(s),	)	
vs.	)	1:22-cv-01576-JPH-MG
	)	
THE UNITED STATES	)	
Defendant(s)-	)	

**NOTICE, CONSENT, AND REFERENCE OF A CIVIL ACTION TO MAGISTRATE JUDGE**

*Notice of magistrate judge's availability.* A United States magistrate judge of this court is available to conduct all proceedings in this civil action (including a jury or nonjury trial) and to order the entry of a final judgment. The judgment may then be appealed directly to the United States court of appeals like any other judgment of this court. A magistrate judge may exercise this authority only if all parties voluntarily consent.

You may consent to have your case referred to the currently assigned magistrate judge, or you may withhold your consent without adverse substantive consequences. The name of any party withholding consent will not be revealed to any judge who may otherwise be involved with your case.

*Consent to magistrate judge's authority.* If all parties consent to have the currently assigned United States magistrate judge conduct all proceedings in this case including trial, the entry of final judgment, and all post-trial proceedings, they should sign their names below (electronically or otherwise). Should this case be reassigned to another magistrate judge, any attorney or party of record may object within 30 days of such reassignment. If no objection is filed, the consent will remain in effect. **NOTICE: This document is eligible for filing only if executed by all parties. The parties can also express their consent to jurisdiction by a magistrate judge in the Case Management Plan.**

<i>Parties' printed names</i>	<i>Signatures of parties or attorneys</i>	<i>Dates</i>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**Reference Order**

**IT IS ORDERED:** This case is referred to the currently assigned United States magistrate judge to conduct all proceedings and order the entry of a final judgment in accordance with 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73. Should this case be reassigned to a magistrate judge other than the magistrate judge assigned the date of this order, any attorney or party of record may object within 30 days of such reassignment. If no objection is filed, the consent will remain in effect.

Date: \_\_\_\_\_

\_\_\_\_\_  
*District Judge's signature*

\_\_\_\_\_  
*Printed name and title*